



Supply Base Report: Enviva Pellets Waycross, LLC

Re-assessment

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Completed in accordance with the Supply Base Report Template Version 1.3

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

On the first page include the following information:

Producer name: Enviva Pellets Waycross, LLC

Producer location: 3390 Industrial Boulevard, Waycross, GA 31503

Geographic position: 82°24'42.38" W / 31°15'22.80" N

Primary contact: Don Grant
4242 Six Forks Road
Raleigh, NC 27609, USA
(984) 789-3642 ext. 1069
don.grant@envivabiomass.com

Company website: www.envivabiomass.com

Date report finalised: 31/08/2020

Close of last CB audit: 9/08/2019 Waycross, GA

Name of CB: SCS Global Services

Translations from English: NA

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.envivabiomass.com/sustainability/responsible-sourcing/third-party-certifications/>

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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2 Description of the Supply Base

2.1 General description

Enviva Pellets Waycross, LLC (Enviva) purchases softwood and hardwood wood fiber from one hundred sixty one (161) counties (21,645,034 hectares) in Alabama (AL), Florida (FL), Georgia (GA) and South Carolina (SC) within the United States. Forests are the predominant land use in this supply base (67%). Pine forests comprise the largest forest type (49.7%) of the supply area's forest followed by hardwood forests (37.7%). The pine/oak forest comprises 10.5% of the supply area's forest type while 2.1% of the forest is considered non-stocked. About 63% of the supply area's forests are managed as natural forests (9.073 MM hectares) while the remaining 35% of the supply area's forests are artificially regenerated (5.113 MM hectares). These forests are primarily owned by private individuals, companies or investments groups (85.3%). Federal lands account for 8.0% and state lands account for 5.4% of the forestland in Enviva's supply base area. Local municipalities own approximately 1.3% of the forestland.

The forest products industry is a very large part of the area's economy and is one of the top industries within the states generating \$18.5 billion industry in AL (2016), \$25.05 billion industry in FL (2016), \$21.3 billion industry in GA (2017) and \$21.2 billion industry in SC (2018) annually (Table 1). This pellet mill is one of the largest in the United States.

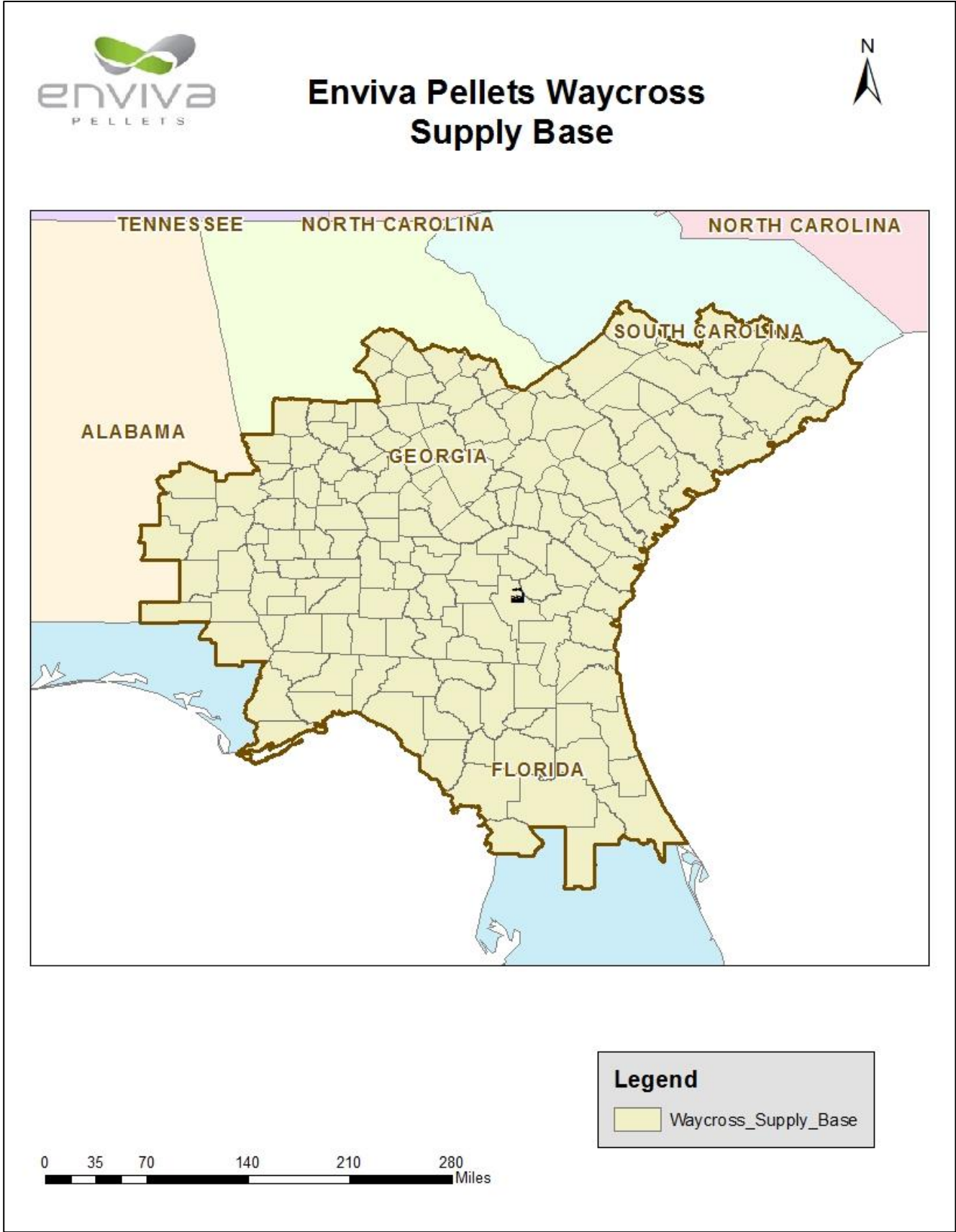
Table 1. Number of Wood Consuming Mills in the Supply Base Area

State	Number of Wood Using Facilities in State				
	Pulp/Paper	Sawmill	Bioenergy	Chip Mill	Other
AL	13	77	6	8	67
FL	6	37	3	3	25
GA	12	93	13	28	61
SC	7	34	6	10	36

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 elliotii*) and longleaf pine (*Pinus palustris*). Primary species for the hardwood forests include oak (*Quercus spp*), sweetgum (*Liquidambar styraciflua*), maple (*Acer spp*), sycamore (*Platanus occidentalis*) and blackgum (*Nyssa sylvatica*). No species purchased at the BP's facility is listed on the CITES list.

Longleaf pine is included in the IUCN list because its current extent is much reduced from its historical range. The Longleaf Alliance supports the commercial viability of the species and encourages landowners to restore and continue to manage longleaf stands. To improve their condition, many longleaf stands need active management, particularly the removal of hardwood mid-story, and occasionally canopy thinning, to increase the amount of light that reaches the ground (fostering diverse, abundant ground story plant community that is critical to wildlife habitat value) and to allow prescribed fire to be reintroduced as a management tool.

Map. 1 Enviva Pellets Waycross, LLC Supply Base Area



The most recent USDA Forest Service Forest Inventory & Analysis (FIA) Timber Products Output (TPO) reported that in 2015 there was a total of 66.12 million metric tons of roundwood harvest within the supply base area and Enviva uses 2.4% of the overall wood fiber harvested annually.

Many of the mid-story and canopy trees that need to be removed are low-value and are thus often good biomass feedstocks. In fact, The Longleaf Alliance and Enviva just formed a five-year partnership, focusing on increasing restoration-oriented biomass sourcing from longleaf stands on public and private land as well as the implementation of the longleaf component of Enviva's expanded HCV program. Throughout 2021 Enviva will implement it's full package of HCV programs including the new longleaf pine component at the Waycross facility.

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 can be 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 hardwood feedstock received by the BP does not come from hardwood forests, but rather from non-merchantable hardwood scattered throughout pine and pine/hardwood stands. This hardwood feedstock is 30 years old or less.

The vast majority of forests in Enviva's supply base area is managed according to state forestry best management practices (BMPs). While these BMPs are normally voluntary, all suppliers are contractually required to abide by them. Supplier compliance with state BMPs is verified by periodic audits conducted by Enviva foresters. The Sustainable Forestry Initiative® (SFI®) fiber sourcing certification and 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 the states within the supply area exceed 90%.

Table 2. State Forestry Best Management Practices Compliance Rates

State	Overall BMP Compliance %
Alabama	98.3%
Florida	99.6%
Georgia	94.4%
South Carolina	97%

Sustainable forestry certification is present in the BP's supply with the company purchasing 44% of its fiber as certified (SFI – 30% and ATFS – 14%). No FSC® certified fiber has been purchased to date.

Enviva purchases its feedstock from;

- Small forestland owners provide 56% of the primary feedstock while large private landowners provide the remaining 44%
- Primary feedstock consist of; of pine and hardwood roundwood and in-woods chips provided by 41+/- suppliers.
- Secondary feedstock is received in the form of pine and hardwood residual chips & sawdust and pine shavings from 35+/- secondary sawmill suppliers.
- Primary feedstock accounts for 78% of the total feedstock.
- Secondary & wood industry feedstock from chips, sawdust & shavings account for 22% of the total feedstock.
- All feedstock consisted of pine (87%) and hardwood (13%) species.

2.2 Actions taken to promote certification amongst feedstock supplier

Enviva is third party certified to all three of the major chain of custody systems (FSC®, PEFC™ & SFI®). Enviva also maintains certification under the SFI® Fiber Sourcing Program. SFI® Fiber Sourcing requires Enviva to promote sustainable forestry activities and forest certification to our suppliers and landowners. Our staff are actively involved in the FloridaGeorgia and South Carolina SFI®Implementation Committees. SFI Implmentation Committees are groups of SFI® certified companies that work together to enhance on-the-ground forestry operations in in the states they operate.

Enviva actively pursues feedstock from certified sources to encourage those landowners to maintain and expand their certified holdings. Enviva foresters are active in the Florida, Georgia and South Carolina Forestry Associations and the Florida committee of the American Tree Farm System, all of which promote forest sustainability and certification.

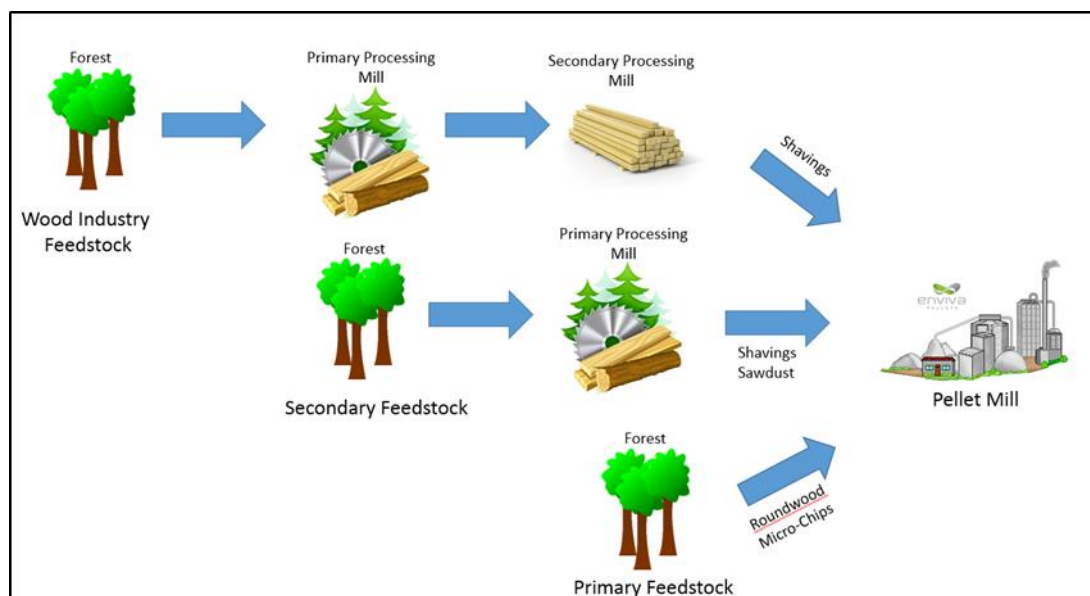
Enviva has partnered with the American Forest Foundation (AFF) on a multi-year certification and Longleaf restoration project for private landowners in the Florida panhandle. This project will also involve The Nature Conservancy and will focus on restoring Longleaf pine ecosystems, improving wildlife habitat, and increasing certified forest around the Enviva facility. Enviva worked closely with AFF, the Florida Tree Farm Committee, and other partners in the development of an American Tree Farm System (ATFS) Landscape Management Plan for the Florida panhandle. This approach will allow landowners to become certified to the ATFS standards utilizing landscape level geospatial data sets to facilitate forest management plan generation. Enviva foresters also participated in the testing of a field app designed to easily access the geospatial data and share it with landowners. Enviva's Waycross manages an ATFS Independent Management Group (IMG) that provides forest management plans and certification for 130 small forest landowners containing 26,800 acres in Georgia.

2.3 Final harvest sampling program

BP, through its SFI Sourcing system, samples at least 10% or a minimum of twenty (20) harvesting sites of all forest tracts from which its primary feedstock originates. This procedure is described in the company's SFI Fiber Sourcing Procedures. BP Fiber Procurement personnel documents the type of harvest, location of harvest, BMP compliance, etc. on the Tract Inspection Form to record this sample data.

During 2019 approximately 75% of the BP's primary feedstock came from final fellings. The other 25% 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

- Total Supply Base area (ha): 21,645,034 ha (total area) / 14,502,379 ha (Forested lands)
- Tenure by type (ha): Privately owned (12,374,469 ha) / Public (2,127,910 ha)
- Forest by type (ha): Temperate (14,502,379 ha)
- Forest by management type (ha): Plantation (5,113,316 ha) / Managed Natural (9,073,146 ha) / Natural (315,917 ha)
- Certified forest by scheme (ha):

Certified Hectares by Standard by State					
	AL	FL	GA	SC	Total
ATF	44,297	36,581	21,020	16,844	118,742
FSC	313,461	51,539	37,438	111,098	513,537
SFI	1,198,808	726,978	922,028	413,318	3,261,132
					3,893,411

Feedstock

- Total volume of Feedstock: >1,000,000 tonnes
- Volume of primary feedstock: >1,000,000 tonnes

- h. List percentage of primary feedstock (g), by the following categories:
- Certified to an SBP-approved Forest Management Scheme - 44%
 - Sustainable Forestry Initiative (SFI) - 30%
 - American Tree Farm (ATF) - 14%
 - Not certified to an SBP-approved Forest Management Scheme - 56%
- i. List all species in primary feedstock, including scientific name

Primary Species: Loblolly Pine (<i>Pinus taeda</i>) Longleaf Pine (<i>Pinus palustris</i>) Slash Pine (<i>Pinus elliotii</i>) Miscellaneous Species: Pond Pine (<i>Pinus serotina</i>) Sand Pine (<i>Pinus clausa</i>) American beech (<i>Fagus grandifolia</i>) Ash (<i>Fraxinus spp</i>) Basswood, American (<i>Tilia americana</i>) Black cherry (<i>Prunus serotina</i>) Black walnut (<i>Juglans nigra</i>) Blackgum (<i>Nyssa sylvatica</i>) Boxelder (<i>Acer negundo</i>) Buckeye (<i>Aesculus spp</i>) Eastern cottonwood (<i>Populus deltoides</i>) Elm (<i>Ulmus spp</i>) Hackberry (<i>Celtis occidentalis</i>)	Miscellaneous Species (con't): Hickory (<i>Carya spp</i>) Locust (<i>Robinia spp</i>) Maple (<i>Acer spp</i>) Oak (<i>Quercus spp</i>) Persimmon (<i>Diospyros virginiana</i>) Red maple (<i>Acer rubrum</i>) Red mulberry (<i>Morus rubra</i>) Red oak (<i>Quercus rubra</i>) River birch (<i>Betula nigra</i>) Sassafras (<i>Sassafras albidum</i>) Sourwood (<i>Oxydendrum arboreum</i>) Sugarberry (<i>Celtis laevigata</i>) Sweetgum (<i>Liquidambar styraciflua</i>) Sycamore (<i>Platanus occidentalis</i>) Water oak (<i>Quercus nigra</i>) White oak (<i>Quercus alba</i>) Yellow-poplar (<i>Liriodendron tulipifera</i>)
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- j. Volume of primary feedstock from primary forest 0 tonnes
- k. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
- Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme 0 tonnes
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme 0 tonnes
- l. Volume of secondary feedstock: 22%
- m. Volume of tertiary feedstock: specify origin and composition - NA

3 Requirement for a Supply Base Evaluation

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

Enviva completed a SBE because there currently is no SBP-endorsed Regional Risk Assessment (RRA) in the United States. Annual reviews of the supply base evaluation have been conducted by Enviva and reviewed each year by its certifying body during annual audits.

4 Supply Base Evaluation

4.1 Scope

Enviva has implemented policies and procedures appropriate to the size and scale of its operations and no indicators were excluded. The definitions of legal and sustainable as used in Standard 1 have been reviewed and met as substantiated in the supply base evaluations. Evidence to support is offered at the supply base level. The supply base evaluation includes all primary and secondary feedstocks that are sourced from counties in all or part of Alabama, Florida, Georgia and South Carolina.

Enviva conducted a supply base evaluation because there is no SBP approved risk assessment in the US. Enviva developed a set of locally applicable verifiers (LAVs), which include a number of publicly available sources, in addition to the internal monitoring already described. The scope included an evaluation for all the legal and sustainability criteria found in SBP Standard 1: Feedstock Compliance Standard. Enviva did not modify and indicators.

4.2 Justification

Only a portion of Enviva's feedstocks is sourced from SBP-approved certification programs, therefore Enviva completed a SBE to be able to differentiate between SBP-compliant and SBP controlled sources when feedstocks are not supply under an approved forest management certificate. Enviva used the process developed by SBP as outlined in SBP Standard 2: Verification of SBP-compliant Feedstock. The use if the FSC US CWNRA as a basis is founded in SBP's guidance document, Assessment of risk, means of verification and mitigation measures in the southeast US as is the use of other third-party sources of information listed in the previous section. Results of Risk Assessment

4.3 Results of Risk Assessment

Each criterion was evaluated and measured against Enviva's existing forest certification and chain of custody programs and the listed LAV's. Information from the FSC US CWNRA was used as a baseline to determine if areas of high conservation value, biodiversity and conversion exist in Enviva's supply base area. Additionally, Enviva works with organizations like the US Endowment for Forestry and Communities, The Long Leaf Alliance, The Nature Conservancy and the American Forest Foundation and others to better understand our sourcing areas, habitats and species of concern. Based on this work and local knowledge Enviva determined a rating of "low risk" for each indicator with the exception of 2.1.1, 2.1.2, 2.2.3, 2.2.4 and 2.4.1. Table 4. Indicators with Specified Risk Ratings

Indicator	Risk Assessment	Management system
2.1.1 The BP has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation value in the Supply Base are identified and mapped.	The US does not have an SBP approved regional risk assessment that fully considers all of the indicators.	Enviva is using the FSC US CWNRA as the baseline for determining potential areas of high conservation value. Additional work with interested and engaged stakeholders has been incorporated into the supply base evaluation to supplement

		Enviva's ability to accurately map areas of high conservation value
2.1.2 The BP 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.	Related to 2.1.1 If areas of high conservation value cannot be adequately identified the management systems or mitigation measures cannot be implemented to reduce risk.	Related to 2.1.1 Enviva's use of the FSC US CWNRA and stakeholder engagement has adequately identified areas of high conservation value. Enviva has robust management systems that can address these areas of specified risk and manage the outcome to low risk
2.2.3 The BP 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).	Related to 2.1.1 Identification of key ecosystems and habitats is necessary to begin the process of identifying if they are properly conserved or set aside	Related to 2.1.1 Enviva's use of the FSC US CWNRA and stakeholder engagement has adequately identified areas of key ecosystems and habitats. Additionally, Enviva's Forest Conservation Fund provides grant monies to successful applicant to help them set aside or conserve forests containing high conservation values, key ecosystems and habitats. Enviva has robust management systems that can address these areas of specified risk and manage the outcome to low risk.

2.2.4 The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).	Related to 2.1.1 Identification of areas with biodiversity concerns is necessary to begin the process of identifying if they are properly protected	Related to 2.1.1 Enviva's use of the FSC US CWNRA and stakeholder engagement has adequately identified areas of key ecosystems and habitats. Additionally, Enviva's Forest Conservation Fund provides grant monies to successful applicant to help them set aside or conserve forests containing high conservation values, key ecosystems and habitats. Enviva has robust management systems that can address these areas of specified risk and manage the outcome to low risk.
2.4.1 The BP 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).	Related to 2.1.1 Identification of forest ecosystems that provide key services is necessary to ensure proper control systems are employed to ensure forest health, vitality and other services are maintained	Related to 2.1.1 Enviva's use of the FSC US CWNRA and stakeholder engagement has adequately identified key forest ecosystems. Additionally, Enviva's Forest Conservation Fund provides grant monies to successful applicant to help them

		<p>set aside or conserve forests containing high conservation values, key ecosystems and habitats.</p> <p>Enviva has robust management systems that can address these areas of specified risk and manage the outcome to low risk.</p>
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4.4 Results of Supplier Verification Programme

Not applicable; the results of the risk assessment indicate there are no indicators determined to be “unspecified risk”.

4.5 Conclusion

Enviva has completed a robust supply base evaluation that fully meets the SBP requirements. All criteria have been fully evaluated and appropriate procedures and controls are in place to ensure successful management of the indicators with specified risk to low risk. As described above, Enviva has an extremely sophisticated data collection and monitoring program which supports the conclusions and actions in the risk assessment. Enviva has well established and industry recognized best practices which are described in our commitment to responsible wood sourcing. Enviva’s supply base evaluation, procedures and processes are audited annually by an independent third party and are found to be in conformance with SBP Standards.

Minimizing risk from Primary Feedstock

Overall, when deciding whether to purchase primary feedstock from a given tract, Enviva’s goal is to determine whether that tract will, if harvested, produce a new tract with the same desirable species content that was present before harvest. Indicators that should be considered in this decision include forest type, location, species composition, hydrology and water flow, stand age and soil saturation. When assessing a tract for HCVs, Enviva evaluates all of these important characteristics. If there is evidence based on this first level of evaluation that the site may be an HCV area on the tract, then the forester must perform a second level review which includes an on-site assessment, data collection and documentation prior to purchase.

At the landscape scale, we endeavour to contribute to a working forest landscape with a diversity of age classes representing various forest type assemblages which can, over the long and short term, provide wildlife habitat, recreation, buffers for climate change, and other ecosystem services, while still playing a pivotal role in conservation and working forests in the Enviva supply base area.

Minimizing risk from Secondary Feedstock

Enviva purchases sawmill and wood industry residues in the form of sawdust, shavings, or other waste products from the milling process. Secondary feedstock suppliers receive an initial visit prior to beginning deliveries, to verify their operations and products. All sawmill and wood industry suppliers are required to complete a Supplier Audit Checklist, providing Enviva with information on the source of their wood as well as any certifications and species used. Enviva includes their supply areas in our supply base evaluation and provides each supplier with feedback on their supply area, noting any areas of risk that may be present. Enviva may choose to cease deliveries from a supplier which refuses to provide the necessary data for us to

properly include their supply area in our risk assessment. Enviva contacts each sawmill and wood industry supplier annually to ensure their data are accurate.

Senior Management Involvement

Senior management is fully engaged and involved in the success of SBP Standard conformance. This report is reviewed and approved by members of the Senior Management Team. Enviva has a well-qualified and knowledgeable staff whom are capable of maintaining process control to achieve conformance to the SBP Standards. Each criterion has specific controls (e.g. contractual, field verification, supplier data requests) to provide Enviva with the best level of confidence to ensure conformance to the criteria included in the SBP Standard.

5 Supply Base Evaluation Process

The supply base was determined based on primary, secondary & wood industry feedstock suppliers to ensure the complete geography of the supply area. The suppliers and sub-suppliers identified were located using GIS technology. Their estimated supply area was determined through interviews with these suppliers to establish the counties they source from or a sixty (60) mile delivery radius was established for each supplier. The accumulation of these feedstock supplier areas was then used to identify the origin of wood fiber by states and counties from which the BP purchases wood fiber. USDA Forest Service FIA 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). Forest management regimes for the supply base were determined from information gathered from local forestry professionals and contractors within the region.

Enviva uses the FSC US Controlled Wood National Risk Assessment V1-0 D3-0, stakeholder engagement, its third party certified PEFC/SFI Due Diligence System and FSC Controlled Wood Risk Assessment to continually improve the SBE. Various third party data sources were also used for research in the region such as:

- Forest Stewardship Council
- The Nature Conservancy
- United States Forest Service
- United States Department of Labor
- United States Department of Environmental Protection
- State Forest Service Divisions
- National Council for Air and Stream Improvement
- World Wildlife Fund
- World Bank Governance Index
- Illegal Logging Portal
- Transparency International
- Conservation International
- World Resources Institute
- Convention on International Trade in Endangered Species
- International Union for Conservation of Nature
- Databasin

Regional economic and forest health information was gathered from state forestry agencies and forestry associations. The BP 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.

The company also uses two verification systems for its primary and secondary/wood industry feedstocks. Primary feedstock suppliers are verified at the forest level through the BP's SFI Fiber Sourcing certification program where company personnel and contractors conduct field inspections of a minimum of 10% of harvest sites for BMPs, harvesting professionals training and traceability. Secondary and wood industry feedstock suppliers are visited at least annually to confirm their supply base, the species they purchase for their operations and if they purchase any fiber from areas considered to have "specified risk". These annual audits are documented on Secondary Supplier Audit Checklist.

6 Stakeholder Consultation

A list of twenty-seven (27) local and regional stakeholders was identified for consultation during the 2015 audit. Seven additional stakeholders in Alabama were identified and contacted during the 2016 audits due to a change in the supply base that included five counties in Alabama. 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 notifying them the intent of the BP to become SBP certified and asking for input on their thoughts on the BP'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.

No complaints or feedback from stakeholders has been received since the previous surveillance audit.

As part of the BP's re-assessment audit, the BP has revised the list of stakeholders to forty-five (45) local and regional organizations in AL, FL, GA and SC. A third stakeholder consultation was completed as part of the BP's re-assessment certification audit.

6.1 Response to stakeholder comments

Responses were received from two stakeholders as of June 25, 2020. Feedback and responses are listed below:

Comment 1: Jim McGurn, Chair, Georgia Tree Farm Program

"Georgia Biomass, LLC has always supported businesses that use wood while creating markets for timber grown under the American Tree Farm System. They are members of the GA Sustainable Forestry Initiative (SFI) State Implementation Committee (SIC) and supports the GA Tree Farm Program. They recently became an Independent Management Group (IMG) Tree Farm certifier and have grown certification by 130 landowners and 26,800 acres in Georgia. This certainly helps with the Tree Farm initiative of growing the program.

In summary, the GA Tree Farm Program supports the re-certification to the SBP."

Response 1: No action necessary

Comment 2: Tim Adams, Resource Development Division Director, South Carolina Forestry Commission

"Thank you for the opportunity to provide comments concerning Georgia Biomass, LLC's operations and the Sustainable Biomass Partnership standards. The Commission supports Georgia Biomass as an additional viable market for forest products from South Carolina. I was not aware that Georgia Biomass receives primary or secondary feedstock from South Carolina, but I encourage you to participate with the Timber Products Output mill survey as that is our official record of fiber usage from the South's timberlands."

Response 2: Response letter sent to SCFC about participating in the Timber Products Output mill survey.

* The 2020 stakeholder consultation started before the announce sale of Georgia Biomass to Enviva.

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	

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

Not applicable; all indicators of the initial risk assessment were determined to be low or specified risk and no unspecified risk was identified. No Supplier Verification Programme is required.

8.2 Site visits

Not applicable.

8.3 Conclusions from the Supplier Verification Programme

Not applicable.

9 Mitigation Measures

9.1 Mitigation measures

Indicator	Management System	Means of Verification
2.1.1 2.1.2	<p>Use of FSC US CWNRA and stakeholder engagement to develop appropriate maps of high conservation value areas</p> <p>Control system/Procedures Enviva uses contractual language in its Wood Purchase Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:</p> <ul style="list-style-type: none"> • Illegally harvest wood; • Wood harvested in violation of traditional and civil rights; • Wood harvested from forests where high conservation values are threatened by management activities; • Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use; • Wood from forests where genetically modified trees are planted; • Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work. <p>Enviva requires all suppliers to sign a Wood Supply Agreement. The Agreement requires suppliers to abide by forest management activities regulations.</p> <p>Enviva requires all suppliers to sign a Wood Supply Agreement. The Agreement requires suppliers to avoid feedstock sources from land use change.</p> <p>Enviva uses its Tract Setup Form process and Supplier Audit Checklist to assess feedstock purchases conformance to these indicators</p>	<ul style="list-style-type: none"> • ENV-SFIS-01 SFI Certified Sourcing Implementation Manual • ENV-PEFCCOC-01 PEFC Chain of Custody Procedures • ENV-FSCCOC-01 FSC Chain of Custody Procedures • ENV-COC-03 Controlled Wood/Controlled Sources Risk Assessment • FSC US Controlled Wood National Risk Assessment • Stakeholder engagement • Wood Purchase Agreement • State BMP Manuals • Tract Setup Form • Supplier Audit Checklist
2.2.3 2.2.4 2.4.1	<p>Control system/Procedures Enviva uses contractual language in its Wood Purchase Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following</p>	<ul style="list-style-type: none"> • Preamble citations • ENV-SFIS-01 Certified Sourcing Implementation Manual • ENV-PEFCCOC-01 PEFC Chain of Custody Procedures

	<p>unacceptable sources wood: (items related to this indicator are underlined)</p> <ul style="list-style-type: none"> • Illegally harvest wood; • Wood harvested in violation of traditional and civil rights; • Wood harvested from forests where high conservation values are threatened by management activities; • Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use; • Wood from forests where genetically modified trees are planted; • Wood in which there was a violation of the ILO Declaration on fundamental principle and rights at work. <p>The Wood Purchase Agreement requires suppliers to avoid key ecosystems and habitats such as old growth forests and forest that could be threatened by forest management activities.</p> <p>The Enviva Forest Conservation Fund, a \$5 million, 10-year program sponsored by Enviva and administered by the U.S. Endowment for Forestry and Communities, is designed to protect tens of thousands of acres of sensitive bottomland forests in the Virginia-North Carolina coastal plain. The Enviva Forest Conservation Fund will award matching-fund grants to non-profit organizations to permanently protect ecologically sensitive areas and preserve working forests. (http://envivaforestfund.org/)</p> <p>Enviva uses its Tract Setup Form process and Supplier Audit Checklist to assess feedstock purchases conformance to these indicators</p>	<ul style="list-style-type: none"> • ENV-FSCCOC-01 FSC Chain of Custody Procedures • ENV-COC-02 Controlled Wood/Controlled Sources Procedure • ENV-COC-03 Controlled Wood/Controlled Sources Risk Assessment • Wood Purchase Agreement • State BMP Manuals and BMP monitoring data • Tract Setup Form • Supplier Audit Checklist
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9.2 Monitoring and outcomes

Enviva conducted 39 field site inspections over the past year. Field inspections aid in monitoring program implementation such as forestry BMP implementation adherence and adherence to Enviva tract approval process. No instances of program violations related to high conservation values, biodiversity or negative impact to health or vitality of key ecosystems were recorded. No tracts were found to be out of compliance.

Enviva's Supplier Audit Checklist process requires secondary feedstock suppliers to annually complete update their supply area information. This annual information exchange is used to assess changes in a

secondary feedstock suppliers sourcing practices and to determine if the feedstock provided by the supplier is SBP-compliant or SBP-controlled. Enviva received secondary feedstock from 30 individual mills, all are SBP-compliant based on their responses to Enviva District of Origin Form and known high conservation value areas.

10 Detailed Findings for Indicators

Detailed findings for each Indicator are given in Annex 1.

11 Review of Report

11.1 Peer review

No peer review has been completed for this report.

11.2 Public or additional reviews

No additional external review of this report has been completed by other stakeholders.

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	<i>Don Grant</i>	<i>Manager, Sustainability Standards</i>	<i>20- JUL-2020</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>Jennifer Jenkins</i>	<i>Vice President & Chief Sustainability Officer</i>	<i>21-Jul-2020</i>
	Name	Title	Date
Report approved by:	<i>Thomas Meth</i>	<i>Executive Vice President Sales and Marketing</i>	<i>31-Aug-2020</i>
	Name	Title	Date

13 Updates

Note: Updates should be provided in the form of additional pages, either published separately or added to the original public summary report.

13.1 Significant changes in the Supply Base

None

13.2 Effectiveness of previous mitigation measures

Mitigation measures have been implemented within the last year. Their effectiveness has not been evaluated.

13.3 New risk ratings and mitigation measures

None

13.4 Actual figures for feedstock over the previous 12 months

See Section 2.5

13.5 Projected figures for feedstock over the next 12 months

- f. Total volume of Feedstock: >1,000,000 tonnes
- g. Volume of primary feedstock: >1,000,000 tonnes
- h. List percentage of primary feedstock (g), by the following categories. - percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*. Subdivide by SBP-approved Forest Management Schemes:
 - a. Certified to an SBP-approved Forest Management Scheme
 - b. Not certified to an SBP-approved Forest Management Scheme
- i. List all species in primary feedstock, including scientific name

Primary Species: Loblolly Pine (<i>Pinus taeda</i>) Longleaf Pine (<i>Pinus palustris</i>) Slash Pine (<i>Pinus elliotii</i>) Miscellaneous Species: Pond Pine (<i>Pinus serotina</i>) Sand Pine (<i>Pinus clausa</i>) American beech (<i>Fagus grandifolia</i>) Ash (<i>Fraxinus spp</i>) Basswood, American (<i>Tilia americana</i>) Black cherry (<i>Prunus serotina</i>)	Miscellaneous Species (con't): Hickory (<i>Carya spp</i>)Locust (<i>Robinia spp</i>) Maple (<i>Acer spp</i>) Oak (<i>Quercus spp</i>) Persimmon (<i>Diospyros virginiana</i>) Red maple (<i>Acer rubrum</i>) Red mulberry (<i>Morus rubra</i>) Red oak (<i>Quercus rubra</i>) River birch (<i>Betula nigra</i>) Sassafras (<i>Sassafras albidum</i>) Sourwood (<i>Oxydendrum arboreum</i>)
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Black walnut (<i>Juglans nigra</i>)	Sugarberry (<i>Celtis laevigata</i>)
Blackgum (<i>Nyssa sylvatica</i>)	Sweetgum (<i>Liquidambar styraciflua</i>)
Boxelder (<i>Acer negundo</i>)	Sycamore (<i>Platanus occidentalis</i>)
Buckeye (<i>Aesculus spp</i>)	Water oak (<i>Quercus nigra</i>)
Eastern cottonwood (<i>Populus deltoides</i>)	White oak (<i>Quercus alba</i>)
Elm (<i>Ulmus spp</i>)	Yellow-poplar (<i>Liriodendron tulipifera</i>)
Hackberry (<i>Celtis occidentalis</i>)	

- j. Volume of primary feedstock from primary forest 0 tonnes
- k. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
- a. Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme 0 tonnes
 - b. Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme 0 tonnes
- l. Volume of secondary feedstock: specify origin and type - the volume may be shown as a % of the figure in (f) and percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*.
- Chips 0-19%
 - Sawdust 0-19%
 - Shavings 0-19%
- m. Volume of wood industry feedstock: specify origin and composition - 0 tonnes

14 Appendix Listing of US Ratified ILO Conventions, Multi-lateral Environmental Instruments and Federal and State Forestry Laws

US Ratified ILO Conventions:

- C053 Officers Competency Certificates Convention, 1936
- C055 Shipowners' Liability (Sick and Injured Seamen) Convention, 1936
- C058 Minimum Age (Sea) Convention (Revised), 1936
- C074 Certification of Able Seamen Convention, 1946
- C080 Final Articles Revision Convention, 1946
- C105 Abolition of Forced Labour Convention, 1957
- C147 Merchant Shipping (Minimum Standards) Convention, 1976
- C150 Labour Administration Convention, 1978
- C160 Labour Statistics Convention, 1985
- C176 Safety and Health in Mines Convention, 1995
- C182 Worst Forms of Child Labour Convention, 1999

US Ratified Multi-Lateral Environmental Instruments:

- Convention for the Long-range Transboundary Air Pollution
- Vienna Convention for the Protection of the Ozone Layer
- United Nations Framework Convention on Climate Change
- Convention for the Protection and Development of Marine Environment of the Wider Caribbean Region
- London Convention
- International Convention for the Prevention of Pollution from Ships, 1973 and subsequent six Protocols
- Protocol on Environmental Protection to the Antarctic Treaty
- The North American Agreement on Environmental Cooperation

Federal and state forestry laws can be found: <https://nationalaglawcenter.org/research-by-topic/forestry/>

Threaten and Endangered species information is located: <https://www.fws.gov/endangered/>

List of Counties in the Supply Base Area

Alabama					
Barbour	Dale	Henry	Macon	Pike	Russell
Bullock	Geneva	Houston			
Florida					
Alachua	DeSoto	Hendry	Levy	Osceola	Suwannee
Baker	Dixie	Hernando	Liberty	Palm Beach	Taylor
Bay	Duval	Highlands	Madison	Pasco	Union
Bradford	Escambia	Hillsborough	Manatee	Pinellas	Volusia
Brevard	Flagler	Holmes	Marion	Polk	Wakulla
Broward	Franklin	Indian River	Martin	Putnam	Walton
Calhoun	Gadsden	Jackson	Miami-Dade	St. Johns	Washington
Charlotte	Gilchrist	Jefferson	Monroe	St. Lucie	
Citrus	Glades	Lafayette	Nassau	Santa Rosa	
Clay	Gulf	Lake	Okaloosa	Sarasota	
Collier	Hamilton	Lee	Okeechobee	Seminole	
Columbia	Hardee	Leon	Orange	Sumter	
Georgia					
Appling	Cherokee	Fannin	Jenkins	Oglethorpe	Thomas
Atkinson	Clarke	Fayette	Johnson	Paulding	Tift
Bacon	Clay	Floyd	Jones	Peach	Toombs
Baker	Clayton	Forsyth	Lamar	Pickens	Towns
Baldwin	Clinch	Franklin	Lanier	Pierce	Treutlen
Banks	Cobb	Fulton	Laurens	Pike	Troup
Barrow	Coffee	Gilmer	Lee	Polk	Turner
Bartow	Colquitt	Glascok	Liberty	Pulaski	Twiggs
Ben Hill	Columbia	Glynn	Lincoln	Putnam	Union
Berrien	Cook	Gordon	Long	Quitman	Upton
Bibb	Coweta	Grady	Lowndes	Rabun	Walker
Bleckley	Crawford	Greene	Lumpkin	Randolph	Walton
Brantley	Crisp	Gwinnett	McDuffie	Richmond	Ware
Brooks	Dade	Habersham	McIntosh	Rockdale	Warren
Bryan	Dawson	Hall	Macon	Schley	Washington
Bulloch	Decatur	Hancock	Madison	Screven	Wayne
Burke	DeKalb	Haralson	Marion	Seminole	Webster
Butts	Dodge	Harris	Meriwether	Spalding	Wheeler
Calhoun	Dooley	Hart	Miller	Stephens	White
Camden	Dougherty	Heard	Mitchell	Stewart	Whitfield
Candler	Douglas	Henry	Monroe	Sumter	Wilcox
Carroll	Early	Houston	Montgomery	Talbot	Wilkes
Catoosa	Echols	Irwin	Morgan	Taliaferro	Wilkinson
Charlton	Effingham	Jackson	Murray	Tattnall	Worth

Chatham	Elbert	Jasper	Muscogee	Taylor	
Chattahoochee	Emanuel	Jeff Davis	Newton	Telfair	
Chattooga	Evans	Jefferson	Oconee	Terrell	
South Carolina					
Abbeville	Calhoun	Dillon	Hampton	McCormick	Saluda
Aiken	Charleston	Dorchester	Horry	Marion	Spartanburg
Allendale	Cherokee	Edgefield	Jasper	Marlboro	Sumter
Anderson	Chester	Fairfield	Kershaw	Newberry	Union
Bamberg	Chesterfield	Florence	Lancaster	Oconee	Williamsburg
Barnwell	Clarendon	Georgetown	Laurens	Orangeburg	York
Beaufort	Colleton	Greenville	Lee	Pickens	
Berkeley	Darlington	Greenwood	Lexington	Richland	

Annex 1: Detailed Findings for Supply Base Evaluation Indicators

Preamble

Enviva's Waycross Pellet mill is located in the United States. The country has a robust legal system developed using democratic processes. The "rule of law" social system is acknowledged by the World Bank as ranking in *Government Effectiveness* (92%) and *Rule of Law* (89%) and *Regulatory Quality* (92%), indicating that the United States has proven that it possesses effective means to ensure all laws and regulatory requirements are met or addressed if lacking through legal recourse. All verifiers were reviewed by third party auditors. **Internal verifiers** (identified in bold text) may contain sensitive information that cannot be made publicly available. External verifiers are publicly available.

Enviva used the FSC US Controlled Wood Risk Assessment V1.0 D3.0 (FSC US CWNRA) as the basis for its risk assessment and supply base evaluation. SBP has yet to receive a Regional Risk Assessment (RRA) for the US to evaluate and approve thus considers all the currently available assessment resources in and of themselves to be only partially adequate in assessing high conservation value and conversion indicators. If a BP is referencing a publicly available third-party multi-stakeholder risk assessment such as the FSC US CWNRA, and where the nature and location of the specified risk are located within the BP's Supply Base, and the assessment of risk has been completed, the risk rating assigned by the authors should be used unless the BP can provide additional new verification data to prove low risk. For indicators not addressed by the FSC US CWNRA Enviva developed additional Locally Applicable Verifiers that followed the SBP stakeholder consultation approval process.

Enviva's forestry certifications

Enviva maintains a number of third party audited forestry certifications. These certification and underlying systems are audited annually by an accredited third-party certifying body. These standards and their requirements are robust and help their certificate holders demonstrate supply chain transparency in a uniform, auditable process. These internal documents are referenced throughout the Annex:

- ENV-COC-02 Controlled Wood/Controlled Sources Procedure
- ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment
- ENV-SFIS-01 Certified Sourcing Implementation Manual
- ENV-PEFCCOC-01 PEFC Chain of Custody Procedure
-

These internal work documents are based on the following Standards:

- ©Sustainable Biomass Program
- American Tree Farm System™ Independently Managed Group
- Forest Stewardship Council® (FSC) Chain of Custody and Controlled Wood Standard
- Program for the Endorsement of Forest Certifications™ (PEFC) Chain of Custody
- Sustainable Forestry Initiative® (SFI) Fiber Sourcing
- Sustainable Forestry Initiative® (SFI) Chain of Custody

Tools used to develop the Supply Base Evaluation

Enviva developed this supply base evaluation using the FSC US CWNRA and its PEFC Chain of Custody as a basis for its supply base evaluation. Enviva also used a report prepared for the American Hardwood Export Council (AHEC) entitled, *Assessment of Lawful Harvesting & Sustainability of US Hardwood Exports*. Other sources of information include but are not limited to:

- Enviva PEFC Due Diligence System,
- FSC High Conservation Area Mapping tool,
- The Nature Conservancy website and various shapefiles,

- World Wildlife Fund,
- World Bank Governance Index,
- Forest Legality Initiative,
- Transparency International,
- Conservation International,
- World Resources Institute,
- Convention on International Trade in Endangered Species,
- International Union for Conservation of Nature and the
- Databasin web mapping tool.
-

Supplier level assessment

Primary feedstock

We have developed a robust Tract Set up process which includes information at the tract level, including data on the forest type, age, GPS coordinates, acreage, and estimates of volume. Before agreeing to accept material from a certain tract, Enviva's Foresters must obtain and review this tract-level data and enter it into our database, which generates a unique tract ID. Then, upon delivery to the Waycross mill, each load is linked to that tract's ID number. As a result, Enviva knows the tract-level attributes for all the primary wood entering the mill. Enviva uses our SFI Fiber Sourcing verifiable monitoring program as a basis for monitoring tract harvests.

Enviva only accepts wood from tracts in which the logger has completed and maintains training through a SFI-approved trained logger program.

If monitoring uncovers issues with incoming raw material, Enviva will contact suppliers to notify them of the issue. If needed, Enviva will cease accepting deliveries from a supplier who does not perform to our sustainability standards. Enviva will not accept further deliveries from a poorly performing supplier until the supplier demonstrates the ability to adhere to Enviva's sustainability requirements.

Overall, when deciding whether to purchase primary feedstock from a given tract, Enviva's goal is to determine whether that tract will, if harvested, produce a new tract with the same desirable species content that was present before harvest.

Secondary feedstock

Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations Document. The process collects information about the suppliers sourcing area, species processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses tract level Tract Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers. Enviva's Supplier Audit Checklist approach is also in alignment with SBP Guidance Document: Meeting SBP Criteria in relation to protecting exceptional conservation values in the southern US. The process Enviva employs through its annual

Supplier Audit Checklist update process ensures Enviva can meet and exceed the guidance provided in the document therefore providing conformance to indicators 2.1.1 and 2.1.2.

The system has been verified effective by an independent third-party Certifying Body (CB), who reviewed both internal and external sources of information. The CB conducted the required secondary supplier site visits, interviews and analysis and confirmed that the information supplied by the secondary suppliers was accurate, and that Enviva's Supplier Audit Checklist process is sound and is operating consistently with SBP Interpretation and Guidance.

Forestry best management practices

Many of the indicators contain references to forestry BMP's (BMP). BMP guidelines were developed at the state level in response to the federal Clean Water Act requirement pertaining to non-point source water quality. Most states have monitoring programs to evaluate BMP effectiveness and compliance rates, and some states require their use. Enviva and many other wood industry companies, however, require the use of forestry BMP's regardless of the state's stance. Table 1 below* shows the high rate of BMP compliance across Enviva's supply base area. Though forestry BMP's are not a complete solution to many of the criteria they do serve as a measure of sound forestry practices.

Table 1. Selected Percent Forestry Best Management Compliance Rates by State¹

	AL	FL	GA	SC
Forest Road	95	100	90	97
Skid Trail		100	97	
Log Landing		100	97	
Stream Crossing	97	100	93	74
SMZ ²	97	99	93	82
Wetlands		100	92	
Reforestation			99	100
Manual site Prep	97	99	95	93
Chemical Site Prep	95	100	100	100
Pesticide Application		100	100	100
Prescribed Fire	96	100	90	60
State Average	96	100	94	89

1. Not all categories are ranked in every state

2. Streamside Management Zone

The National Association of State Forester (NASF) recently released publication, *Protecting The Nation's Water: State Forestry Agencies and Best Management Practices*. The publication covers all 50 US States and eight of its territories. The state forestry BMP implementation rates for the Waycross supply base area are listed in the appendix and the NASF publication concluded.

"Across the country, BMP's are implemented appropriately, when and where they are needed, 92% of the time. This is a figure not only one state forestry agency can be proud of: it serves as strong evidence in support of a silvicultural exemption to Clean Water Act permitting requirements".

*Source National Association of State Foresters publication, *Protecting The Nations Water: State Forestry Agencies and Best Management Practices* (<https://www.stateforesters.org/newsroom/protecting-the-nations-water-state-forestry-agencies-and-best-management-practices/>)

Links to each state's forestry BMP's is below.

- Alabama – http://www.forestry.alabama.gov/Pages/Management/BMP_Measures.aspx
- Florida – <https://www.fdacs.gov/Forest-Wildfire/Silviculture-Best-Management-Practices>
- Georgia – <https://treeordzone.files.wordpress.com/2017/04/georgias-best-management-practices-for-forestry.pdf>
- South Carolina – <https://www.state.sc.us/forest/refbmp.htm>

Means of Verification

SBP's definition of means of verification: A systematic collection and review of objective evidence to verify compliance with a specified criterion. Evidence may include legislation, delivery and other records, supplier contracts, statements of fact or other information which are verifiable.

In some indicators this can be achieved with accessible third-party information. For instance, indicator 2.1.1 the identification of areas with high conservation values can be accomplished using publicly available third-party sources of information though Enviva goes farther by continually engaging with willing stakeholders like The Nature Conservancy, Earthworm, NatureServe and other's listed in Section 6 of the SBR. We do this to ensure we have the most up to date information and some of that work is proprietary.

In some indicators the Biomass Producer is required to demonstrate they have processes and/or procedures to verify their sourcing practices can address the topic(s) of the indicator. And other might require a combination of the two approaches.

Proof of implementation of appropriate controls and procedures to identify and address potential threats (2.1.2) requires signed contract, internal audit forms, assessment processes. Many if these documents contain sensitive information about our suppliers, where and how they purchase wood and performance information necessary to conform to the SBP Standards. Some of the documents are internal working and procedures documents Enviva staff use to ensure we consistently perform our tasks in a manner that can be verified through third-party audits. The approach aligns with SBP Guidance Document: Assessment of risk, means of verification and mitigation measures in the southeast US.



Enviva Pellets Waycross Supply Base



0 35 70 140 210 280 Miles

Legend

Waycross_Supply_Base

	Indicator
1.1.1	The Biomass Producer's Supply Base is defined and mapped.
Finding	<p>Supplier sourcing areas are tracked through Enviva's Tract Set up process and a robust Supplier Audit Checklist process. Tract level information from primary feedstock suppliers include the GPS location of each source tract. Secondary feedstock suppliers provide specific information about their supply base area and its location such as its radius or county list. Both sets of location information are used to ensure Enviva can identify the geographic location of its feedstock supply. Enviva's supply base area includes counties in Alabama, Florida, Georgia, and South Carolina. Data is entered into computer programs and reviewed annually to ensure appropriateness. This information is used to define the supply area and create maps</p> <p>ENV-COC-02 Controlled Wood/Controlled Sources Procedure is an internal document describing the process Enviva follows to ensure it knows where feedstocks originate.</p> <p>ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is Enviva's FSC Controlled Wood Risk Assessment/PEFC Due Diligence System document that defines how the supply area is assessed for risk to satisfy FSC and PEFC requirements, the basis of an SBP system.</p> <p>ENV-PEFCCOC-01 PEFC Chain of Custody Procedure and ENV-COC-02 Controlled Wood/Controlled Sources Procedure are internal documents describing the process Enviva follows to ensure it knows where feedstocks originate.</p> <p><u>Conclusion</u> Enviva's Chain of Custody certifications require the company to develop and maintain a Controlled Wood Risk Assessment/Due Diligence System that ensure Enviva annually reviews its supply base area for accuracy. The risk of wood from un-known regions entering Enviva supply is low</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. Tract Set up process c. ENV-COC-02 Controlled Wood/Controlled Sources Procedure d. Supplier Audit Checklist Process e. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment f. ENV-PEFCCOC-01 PEFC Chain of Custody Procedure
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
1.1.2	Feedstock can be traced back to the defined Supply Base.
Finding	<p>Supplier sourcing areas are tracked through Enviva's Tract Set up process and a robust Supplier Audit Checklist process. Tract level information from primary feedstock suppliers include the GPS location of each source tract. Secondary feedstock suppliers provide specific information about their supply base area and its location. Both sets of location</p>

	<p>information are used to ensure Enviva can identify the geographic location of its feedstock supply. Enviva's supply base area includes counties in Alabama, Florida, Georgia and South Carolina. Data is entered into computer programs and reviewed annually to ensure appropriateness. Enviva maintains a PEFC CoC certification for all Enviva pellet mills. The certification track wood through the supply chain, while also ensuring unwanted sources of wood do not enter the supply chain.</p> <p>Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance.</p> <p>ENV-SFIS-01 Certified Sourcing Implementation Manual is Enviva's SFI feedstock sourcing manual. Indicator 2.1.2 requires the use of written agreements (Delivered Fiber Agreement) for all feedstocks sourced from the forest. This means Enviva will only purchase feedstocks from companies where we have an existing business relationship.</p> <p>ENV-PEFCCOC-01 PEFC Chain of Custody Procedure and ENV-COC-02 Controlled Wood/Controlled Sources Procedure describe the workflow for ensuring Enviva satisfies the chain of custody requirements.</p> <p>Enviva maintains three chain of custody systems; FSC, PEFC and SFI. These systems are designed to follow both certified feedstocks and Controlled Wood/Controlled Source feedstocks to their county of origin, at a minimum.</p> <p><u>Conclusion</u> Enviva's Chain of Custody certifications require the company to develop and maintain a Controlled Wood Risk Assessment/ Due Diligence System that ensures that the origin of all feedstocks is known.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. ENV-SFIS-01 Certified Sourcing Implementation Manual c. Tract Set up process d. ENV-COC-01 PEFCCOC-01 PEFC Chain of Custody Procedure e. ENV-COC-02 Controlled Wood/Controlled Sources Procedure f. Supplier Audit Checklist Process g. Delivered Fiber Agreement
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
1.1.3	The feedstock input profile is described and categorised by the mix of inputs.
Finding	Enviva tracks purchased and consumed material by product type (roundwood, wood chips, residuals, etc.) and general species groupings of softwood or hardwood. Wood is stored at the mill site by product/species and input verified by monthly inventory processes. Certified wood inputs coming into the mill site are mingled with other wood and all non-certified inputs are considered "controlled".

	<p>ENV-PEFCCOC-01 PEFC Chain of Custody Procedure requires a PEFC certificate holder to develop a process to describe feedstock profiles for the purpose of tracking through processing. ENV-COC-02 Controlled Wood/Controlled Sources Procedure describes how feedstock purchases are categorized before purchase.</p> <p>The Monthly Wood Excel is a mill site-specific workbook used to track tons of each feedstock type into and through the process from raw material to final product.</p> <p><u>Conclusion</u> These certifications track feedstock through the supply chain, while also ensuring unwanted sources of wood do not enter the supply chain</p>
Means of Verification	<p>a. Preamble citations</p> <p>b. ENV-PEFCCOC-01 PEFC Chain of Custody Procedure</p> <p>c. ENV-COC-02 Controlled Wood/Controlled Sources Procedure</p> <p>d. Monthly Wood Excel</p>
Evidence Reviewed	All means of verification reviewed
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

	Indicator
1.2.1	<p>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.</p>
Finding	<p>Some relevant findings from the FSC US CWNRA:</p> <p>1.1 Land tenure and management rights finds the US legality of ownership to be a low risk citing landownership records in the US are highly reliable and frequently used by banking institutions to issue mortgages generally requiring title clearances. The FSC US CWNRA cited the Seneca Creek Associates, LLC report entitled, <i>Assessment of Lawful Harvesting & Sustainability of US Hardwood Exports</i>, "The vast majority of private landowners own small family forests that average less than 10 hectares in size. Numerous legal processes are available to landowners to resolve disputes involving proper title and/or the unauthorized taking or sale of timber property." Seneca Creek Report 2008, p ii.</p> <p>Further, "Comparisons of international governance indicators, such as those compiled by the World Bank, strongly indicate that the US is perceived as a country with a high regard for the rule of law, an effective environmental, labor and public welfare regulatory environment, and a low level of corruption." Seneca Creek Report 2008, p iii.</p> <p><u>Additional evidence</u> Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood including illegally harvested wood:</p> <ul style="list-style-type: none"> - Illegally harvest wood; - Wood harvested in violation of traditional and civil rights; - Wood harvested from forests where high conservation values are threatened by management activities; - Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use;

	<ul style="list-style-type: none"> - Wood from forests where genetically modified trees are planted; - Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work. <p>Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement. The Delivered Fiber Agreement has among its many recitals requirements for feedstock supplier to ensure legality of ownership.</p> <p>ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if illegal logging and timber theft are a risk in the supply area. This document uses many of the same sources as the FSC US CWNRA. Both conclude illegal logging is a low risk in the Enviva supply area. Further evidence indicates that the rule of law and public agency governance are upheld so illegality is considered low risk. Enviva has implemented procedures to conform to EUTR.</p> <p>Enviva's Responsible Sourcing Policy publicly describes Enviva's commitment to avoid illegal sources of wood.</p> <p>SFI Fiber Sourcing Standard Objective 4 requires a certificate holder to comply with all applicable federal, provincial and local laws and regulations. ENV-SFIS-01 Certified Sourcing Implementation Manual describes processes and internal documents Enviva uses to meet the Objective. Specifically, indicators 4.1.4 and 4.1.5 requires the Program Participant to demonstrate it assessed if wood is legally sourced and put in programs to address risks of illegal sourcing if any exist. The 4.1.4 assessment found no significant risk of buying wood from illegal sources.</p> <p>The PEFC Chain of Custody Standard requires the certificate holder to ensure it knows where feedstocks originate and ensure wood is legally sourced. ENV-PEFCCOC-01 PEFC Chain of Custody Procedure and ENV-COC-02 Controlled Wood/Controlled Sources Procedure are Enviva documents describing the workflow to ensure feedstock are legally and sustainably sourced.</p> <p>US ranks in the top 92 percentile in Regulatory Quality in the World Bank, Worldwide Governance Indicators and in the top 89 percentile in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic abuse of traditional or civil rights in the Enviva supply base area.</p> <p><u>Conclusion</u></p> <p>The risk of illegally harvested wood or wood from land use change entering Enviva's supply chain is low</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. FSC US CWNRA c. ENV-SFI-01 SFI Certified Sourcing Implementation Manual d. ENV-PEFCCOC-01 PEFC Chain of Custody Procedure e. ENV-COC-02 Controlled Wood/Controlled Sources Procedure f. ENV-COC-03 Controlled Wood/Controlled Sources Risk Assessment g. Delivered Fiber Agreement h. Enviva Responsible Sourcing Policy i. World Bank Governance Index j. State laws

Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	<p>Some relevant FSC US CWNRA indicators:</p> <p>1.2 Concessions on licenses determined a low risk rating in the US for legality of harvest in determining, “On the whole, the risk of illegality in entering into contracts, public or private, is real, but is considered low.”</p> <p>1.4 Harvesting permits – “Corruption associated with timber sales and harvesting permits in the US is generally not an issue.”</p> <p>Some additional sources of evidence include:</p> <ul style="list-style-type: none"> • www.eia-international.org – publication <i>Forests A Tale of Two Laws</i> (February 2018 determined the US Lacey Act and the EUTR work effectively together to prohibit the transfer of illegally harvested wood between the US and EU countries • www.transparency.org – ranks the United States 23rd on its Corruption Perceptions Index 2019 out of the 180 countries indicating a low risk of corruption. <p><u>Additional evidence</u></p> <p>Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:</p> <ul style="list-style-type: none"> - Illegally harvest wood; - Wood harvested in violation of traditional and civil rights; - Wood harvested from forests where high conservation values are threatened by management activities; - Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use; - Wood from forests where genetically modified trees are planted; - Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work. <p>Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva’s legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement. The Delivered Fiber Agreement requirements for feedstock suppliers requires legality of ownership and ensures conformance with EUTR.</p>

	<p>In the United States regulation of forestry practices has its roots in Federal law and in Acts designed to provide guidance to states for developing state specific laws and regulations. The US ranks in the top 92nd percentile in Regulatory Quality in the World Bank, Worldwide Governance Indicators and in the top 89th percentile in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and this reporting reveals no widespread or systematic criminal activity in the Enviva supply base area.</p> <p>SFI Fiber Sourcing Standard Objective 4 requires a certificate holder to comply with all applicable federal, provincial and local laws and regulations. ENV-SFIS-01 Certified Sourcing Implementation Manual describes processes and internal documents Enviva uses to meet the Objective. Specifically, indicators 4.1.4 and 4.1.5 requires the Program Participant to demonstrate it assessed if wood is legally sourced and put in programs to address risks of illegal sourcing if any exist. The 4.1.4 assessment found no significant risk of buying wood from illegal sources.</p> <p>The PEFC Chain of Custody Standard requires the certificate holder to ensure it knows where feedstocks originate and ensure wood is legally sourced. ENV-PEFCCOC-01 PEFC Chain of Custody Procedure and ENV-COC-02 Controlled Wood/Controlled Sources Procedure are Enviva documents describing the workflow to ensure feedstock are legally and sustainably sourced.</p> <p>Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure Enviva is aware of changes. The analysis includes a review of the existence of appropriate laws regarding legality of harvest and compliance with EUTR requirements. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if illegal logging and timber theft are a risk in the supply area. This document uses many of the same sources as the FSC US CWNRA. Both conclude illegal logging is a low risk in the Enviva supply area. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment and revisions to the Delivered Fiber Agreement.</p> <p>Enviva's Responsible Sourcing Policy publicly describes Enviva's commitment to avoid illegal sources of wood.</p> <p>Enviva EUTR Compliance Document is the report Enviva provides to its customers upon request describing how it meets EUTR requirements.</p> <p><u>Conclusion</u> Enviva is in compliance with EUTR legality requirements.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. FSC US CWNRA c. ENV-SFIS-01 Certified Sourcing Implementation Manual d. ENV-PEFCCOC-01 PEFC Chain of Custody Procedure e. ENV-COC-02 Controlled Wood/Controlled Sources Procedure f. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment g. Enviva Responsible Sourcing Policy h. Delivered Fiber Agreement i. Enviva EUTR Compliance Document j. Assessment of Lawful Harvesting & Sustainability of US Hardwood Export Council k. World Bank Worldwide Governance Indicators

Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> 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	<p>Some relevant FSC US CWNRA indicators:</p> <p>1.5 Payment of royalties and harvesting fees there is no evidence of efforts to avoid payment and determined a low risk rating</p> <p>1.6 Value added taxes and other sales taxes finds a low risk of tax avoidance.</p> <p>1.7 Income and profit taxes concluded there is a low risk these taxes are not paid citing income and profit taxes are levied and managed at the federal and state level.</p> <p><u>Additional evidence</u></p> <p>Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations including payment of royalties and taxes. The contract also includes the requirement to avoid the following unacceptable sources wood and includes a requirement to ensure all appropriate taxes, royalties, etc. are paid:</p> <ul style="list-style-type: none"> • Illegally harvest wood; • Wood harvested in violation of traditional and civil rights; • Wood harvested from forests where high conservation values are threatened by management activities; • Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use; • Wood from forests where genetically modified trees are planted; • Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work. <p>Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.</p> <p>The states in Enviva's supply all have laws governing taxation. The United States legal system is robust and capable of enforcing these Federal and state laws.</p> <ul style="list-style-type: none"> • Transparency International ranks the United States 23rd on its Corruption Perceptions Index 2019 out of the 180 countries indicating a low risk of corruption. • AHEC Legality Study determined the region Enviva supply base area is located is a low risk for illegal activity • The World Bank Worldwide Governance indicators ranked the US in the top 89th percentile in the Rule of Law category • The World Bank Worldwide Governance indicators ranked the US in the top 92nd percentile in the Regulatory Quality category

	<p>Enviva's Responsible Sourcing Policy publicly describes Enviva's commitment to require suppliers ensure all appropriate payments, fees and taxes are paid.</p> <p>The PEFC Chain of Custody Standard requires the certificate holder to ensure it knows where feedstocks originate and ensure wood is legally sourced. ENV-PEFCCOC-01 PEFC Chain of Custody Procedure and ENV-COC-02 Controlled Wood/Controlled Sources Procedure are Enviva documents describing the workflow to ensure feedstock are legally and sustainably sourced.</p> <p>Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure Enviva is aware of changes. The analysis includes a review of the existence of appropriate laws to ensure the payment of relevant fees and taxes. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if illegal logging and timber theft are a risk in the supply area. This document uses many if the same sources as the FSC US CWNRA. Both conclude illegal logging is a low risk in the Enviva supply area. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment and revisions to the Delivered Fiber Agreement.</p> <p>SFI Fiber Sourcing Standard Objective 4 requires a certificate holder to comply with all applicable federal, provincial and local laws and regulations. ENV-SFIS-01 Certified Sourcing Implementation Manual describes processes and internal documents Enviva uses to meet the Objective. Specifically, indicators 4.1.4 and 4.1.5 requires the Program Participant to demonstrate it assessed if wood is legally sourced and put in programs to address risks of illegal sourcing if any exist. The 4.1.4 assessment found no significant risk of buying wood from illegal sources.</p> <p>In certain state wood consuming mills are required to pay severance taxes on the wood used for manufacturing. These internal records are used to show Enviva's compliance with state requirements.</p> <p><u>Conclusion</u></p> <p>There is a low risk of non-payment payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. FSC US CWNRA c. Enviva Responsible Sourcing Policy d. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment e. ENV-COC-02 Controlled Wood/Controlled Sources Procedure f. ENV-PEFCCOC-01 PEFC Chain of Custody Procedure g. ENV-SFIS-01 Certified Sourcing Implementation Manual h. Delivered Fiber Agreements i. Severance Tax Reports j. World Bank Worldwide Governance Indicators
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> 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	<p>Some FSC US CWNRA finding related to this indicator include:</p> <p>1.19 Customs regulations – The Lacey Act and other US code and enforcement find there is a low risk of a US company purchasing species listed by CITES.</p> <p>1.20 CITES finds no tree species with commercial timber value is listed on the CITES Appendices determining the there is a low risk of sourcing CITES species in North America.</p> <p>1.21 Legislation requiring due diligence/due care procedures cites the Lacey Act as the legislation that prohibits the importation of illegally sourced wood into the US.</p> <p>US ranks in the top 92 percentile in Regulatory Quality in the World Bank, Worldwide Governance Indicators and in the top 89 percentile in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic abuse of traditional or civil rights in the Enviva supply base area.</p> <p><u>Additional evidence</u></p> <p>Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment determined the supply base area as a low risk for the potential to source CITES species. This document uses many if the same sources as the FSC US CWNRA. Both conclude sourcing CITES listed species is a low risk in the Enviva supply area. CITES enforcement is controlled at the federal level involving US Customs and Border Protection, Animal and Plant Health Inspection Services and the US Fish and Wildlife Service. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment and revisions to the Delivered Fiber Agreement.</p> <p>Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement. None of the tree species Enviva uses at its Enviva Pellet Mill are on the CITES list. None of the feedstock used at the Enviva Pellet Mill comes from outside of the US.</p> <p>The PEFC Chain of Custody Standard requires the certificate holder to ensure it knows feedstocks meet CITES requirements. ENV-PEFCCOC-01 PEFC Chain of Custody and ENV-COC-02 Controlled Wood/Controlled Sources Procedure are Enviva documents describing the workflow to ensure feedstock are in conformance.</p> <p>Enviva's secondary feedstock suppliers are checked during periodic supplier audits.</p> <p>Primary feedstock suppliers are randomly audited at the FMU level to verify the information provided is accurate.</p> <p><u>Conclusion</u></p> <p>There is a low risk of CITES species being used as feedstock at Enviva</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. FSC US CWNRA c. ENV-PEFCCOC-01 PEFC Chain of Custody Procedure

	<ul style="list-style-type: none"> d. ENV-COC-02 Controlled Wood/Controlled Sources Procedure e. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment f. Supplier Audit Checklist Process g. Delivered Fiber Agreement h. Enforcement of the Convention on International Trade in Endangered Species i. Lacey Act and enforcement data j. Tract Inspections k. Supplier Audit Checklist Supplier Audits l. World Bank Worldwide Governance Indicators
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> 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	<p>Some of the FSC US CWNRA findings applicable to this indicator:</p> <p>1.13 Customary rights – “The risk of violating a right held through adverse possession is low. If the right is being held openly and exclusively, the potential violator should be able to discover it through inspection of the land. Overall, customary rights being are not important in forest management, with the possible exception of Native American treaty rights. On balance the risk for this category is assessed as low.”</p> <p>1.15 Indigenous people’s rights – Violations of Indigenous people’s rights are considered a low risk because of the legal relationship between the federal government and Native American tribes. The two treat each other as sovereigns with treaties that outline tribal rights.</p> <p>2.1 The forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control to be low risk in the US</p> <p>2.2 Labor rights are respected including rights as specified in ILO Fundamental Principle and Rights at Work as low risk in the US</p> <p>2.3 The rights of Indigenous and Traditional Peoples are upheld In the United States, land use and tenure questions have long been decided and in the southeast, there are no indigenous people groups with controversial traditional or civil rights to forestlands.</p> <p>The FSC US CWNRA concluded, “Within the U.S. there is no UN Security Council ban on timber exports, the areas are not designated as a source of conflict timber, child labor does not occur systematically, and ILO Fundamental Principles and rights at work are generally respected. In addition, the U.S. has recognized and equitable processes in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity. In the U.S., Native Americans with a land base are recognized</p>

as Sovereign Nations and accorded rights to manage their land and affairs. In addition, Native Americans have an equitable process to resolve conflicts over land management. Through the U.S. court system, many Native American tribes have challenged, won decisions, and resolved issues concerning land management and use rights. There are many examples within the U.S. where tribes have successfully been able to exercise treaty rights through formal and informal conflict resolutions systems.”

The Seneca Creek, LLC report entitled, *Assessment of Lawful Harvesting & Sustainability of US Hardwood Exports* found the same to be true.

Additional evidence

Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:

- Illegally harvest wood;
- Wood harvested in violation of traditional and civil rights;
- Wood harvested from forests where high conservation values are threatened by management activities;
- Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use;
- Wood from forests where genetically modified trees are planted;
- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.

Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva’s legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.

ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if there is a risk of violating traditional and civil rights in the supply area. This document uses many of the same sources as the FSC US CWNRA. Both conclude a low risk of violating traditional and civil rights in the Enviva supply area. Enviva’s ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure Enviva is aware of changes. The analysis includes a review of laws governing traditional and civil rights. Findings are incorporated into Enviva’s ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment and revisions to the Delivered Fiber Agreement.

SFI Fiber Sourcing Standard Objective 4 indicator 4.2.1 requires a Program Participant to have written policies to “comply with social laws, such as those covering civil rights, equal employment opportunities, anti-discrimination and anti-harassment measures, worker’s compensation, indigenous peoples’ rights, workers’ and communities’ right to know, prevailing wages, workers right to organize, and occupational health and safety.” ENV-SFI-01 Certified Sourcing Implementation Manual describes processes and internal documents Enviva uses to meet the requirements.

The PEFC Chain of Custody Standard requires the certificate holder to demonstrate it avoids sources that violate traditional and human rights. ENV-PEFCCOC-01 PEFC Chain of Custody Procedure and ENV-COC-02 Controlled Wood/Controlled Sources Procedure are Enviva documents describing the workflow to ensure feedstocks meet these requirements.

	<p>Enviva's Responsible Sourcing Policy publicly describes Enviva's commitment to avoid sources of wool that violate traditional and civil rights.</p> <p>US ranks in the top 92 percentile in Regulatory Quality in the World Bank, Worldwide Governance Indicators and in the top 89 percentile in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic abuse of traditional or civil rights in the Enviva supply base area.</p> <p><u>Conclusion</u></p> <p>There is a low risk Enviva's sourcing practices are a threat to traditional or civil rights.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. FSC US CWNRA c. Assessment of Lawful Harvesting & Sustainability of US Hardwood Exports d. ENV-PEFCCOC-01PEFC Chain of Custody Procedure e. ENV-COC-02 Controlled Wood/Controlled Sources Procedure f. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment g. ENV-SFIS-01 Certified Sourcing Implementation Manual h. Delivered Fiber Agreement i. Enviva Responsible Sourcing Policy j. World Bank Worldwide Governance Indicators
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> 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	<p>Enviva used the FSC US CWNRA as a basis to identify and map forested areas of high conservation value, areas of high biodiversity and species of concern. The SBP Guidance Document: Assessment of Risk, Means of Verification and Mitigation Measures in the Southeast US provides the platform for using the FSC US CWNRA as a basis for the BP's risk assessment.</p> <p>Enviva only uses woody biomass as a feedstock. Non-forested areas of high conservation value are excluded from the supply base evaluation. Enviva's sourcing policies and suppliers do not impact these non-forested areas. The definition of forest land is defined according to the USFS as, "Land that has at least 10 percent crown cover by live tally trees of any size or has had at least 10 percent canopy cover of live tally species in the past, based on the presence of stumps, snags, or other evidence. To qualify, the area must be at least 1.0 acre in size and 120.0 feet wide. Forest land includes transition zones, such as areas between forest and non-forest lands that meet the minimal tree stocking/cover and forest areas adjacent to urban and built-up lands. Roadside, streamside, and shelterbelt strips of trees must have a width of at least 120 feet and continuous length of at least 363 feet to qualify as forest land. Unimproved roads and trails, streams, and clearings in forest areas are classified as forest if they are less than 120 feet wide or less than an acre in size. Tree-covered areas in agricultural production settings, such as fruit orchards, or tree-covered areas in urban settings, such as city parks, are not considered forest land."</p>

The areas of high conservation value described and mapped in the FSC US CWNRA Indicator 3 were compared to the defined supply area. The FSC US CWNRA identified many areas of high conservation value, biodiversity and species that could be affected by harvesting activities. This supply base evaluation only includes those the authors determined to be specified risk. The supply area overlaps the following areas of high conservation value.

Using the FSC US CWNRA Enviva identified the following Critical Biodiversity Areas (CBA) within the Enviva supply base area:

Florida Panhandle Critical Biodiversity Area – located in all or parts of 9 counties of Enviva's supply base are the Florida Panhandle CBA is reported to be one of the 5 richest biodiversity hotspots in North America. Of particular importance is the richness of frogs (27 species), snakes (42 species) and turtles (18 species) [Source: 49]. This concentration of biodiversity is driven by the river systems (particularly the Apalachicola River), longleaf pine savanna habitat and unique steephead ravines. Species of particular interest include the Okaloosa darter (*Etheostoma okaloosae*) which is endemic to the Florida Panhandle, and the Red-cockaded Woodpecker (*Picoides borealis*) which is associated with the longleaf pine.

Central Florida Critical Biodiversity Area – located in the southern most reach of Enviva's supply base area in parts of 6 counties in Enviva's this CBA contains native pine ecosystems are an important driver for biodiversity. Pine flatwoods in Central Florida are associated with xeric uplands/sandhills that provide a range of biodiversity values. Longleaf pine is the dominant tree species in pine flatwoods, however as with other longleaf pine systems, the native plant diversity is one of the most significant components of the overall biodiversity. Rare wildlife supported by this habitat include Florida black bear (*Ursus americanus floridanus*), Florida panther (*Felis concolor coryi*), Southeastern kestrel (*Falco sparverius paulus*), Red-cockaded Woodpecker (*Picoides borealis*), Florida sandhill crane (*Grus canadensis pratensis*), Bald eagle (*Haliaeetus leucocephalus*), eastern indigo snake (*Drymarshon corais couperi*), and Chapman's rododendron (*Rhododendron chapmanii*).

Native Longleaf Pine Systems – found throughout much of the Enviva supply area. Native longleaf systems threats vary across its natural range with suppression of fire being the greatest concern. Other concerns include conversion to other pine types and incompatible forest management practices.

Late Successional Bottomland Hardwoods – found throughout the south in the floodplains of rivers and streams the forests are periodically flooded or saturated. Variations in structure are determined by the location of the late successional bottomland forest. Generally, 80 years or older the forest is better defined by structure; closed canopy, large wood debris, standing hollow trees and little ground vegetation. Bottomland forests in Mississippi are reduced in size and area from historic clearing to create agricultural fields. Changes in hydrology, improper forest management techniques and invasive species. Forest management in and of itself may not be a threat but how the management is applied can be counterproductive.

Additional evidence

ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine the existence and location of potential areas of high conservation values in the supply area. This document uses many of the same sources as the FSC US CWNRA such as those listed in the preamble. Both risk assessments conclude certain

	<p>areas of specified risk in the Enviva supply area. Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment and this supply base evaluation are reviewed annually to ensure Enviva is aware of changes. Forest Legality Initiative Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement.</p> <p>The SFI Fiber Sourcing Standard Objective 1 Biodiversity in Fiber Sourcing requires Program Participants "to address the practice of sustainable forestry by conserving biological diversity". Enviva's ENV-SFIS-01 Certified Sourcing Implementation Manual describes processes and internal documents Enviva uses to meet Objective 1. Enviva engages with organizations like The Longleaf Alliance and Forest Steward Guild, NatureServe and the Nature Conservancy to gather additional information about the identified high conservation value areas to ensure Enviva can properly identify the Critical Biodiversity Areas in its supply base area.</p> <p>The PEFC Chain of Custody Standard requires the certificate holder to ensure it knows where feedstocks originate and evaluate its supply area to determine if there are areas of high conservation value as part of its Due Diligence System (ENV-PEFCCOC-01 PEFC Chain of Custody Procedure). ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is Enviva's PEFC Due Diligence System and it contains the work done to determine where areas of high conservation are located within the supply area. This document uses many of the same sources as the FSC US CWNRA.</p> <p><u>Conclusion</u></p> <p>According to SBP Guidance Document: Assessment of Risk, Means of Verification and Mitigation Measures in the Southeast US, "SBP has yet to receive a Regional Risk Assessment (RRA) for the US to evaluate for approval and considers all of the currently available assessment resources in and of themselves to be only partially adequate in assessing high conservation value and conversion indicators." Use of the FSC CWNRA is suggested but is considered incomplete.</p> <p>Enviva engages with willing stakeholders to continually assess for potential areas of high conservation value (https://www.greenbiz.com/article/stakeholder-engagement-how-enviva-moved-crisis-collaboration). We find these engagements and subsequent collaborations to be both enlightening and beneficial in the promotion of sustainable forest management</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. FSC US CWNRA c. Enviva Responsible Sourcing Policy d. ENV-SFIS-01 Certified Sourcing Implementation Manual e. ENV-PEFCCOC-01 PEFC Chain of Custody Procedure f. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment g. Stakeholder engagement information
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p><u>Management System</u></p> <p>Enviva will annually review it's Means of Verification and engage with Stakeholders to ensure it can accurately identify and map forests and other areas of high conservation values in its supply base area. As new information is found it will be incorporated into the supply base evaluation.</p>

Risk Rating	<input checked="" type="checkbox"/> Low Risk	<input type="checkbox"/> Specified Risk	<input type="checkbox"/> Unspecified Risk at RA
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	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	<p>Most of the high conservation value areas identified in Enviva's supply base area are associated with streams or water features. Forestry BMP's are the best tool available to ensure forest management activities do not adversely impact forests and other areas of high conservation value such as those identified. And even in areas not associated with streams or water features forestry BMP's specify how roads, trails and other forest management activities are performed to minimize their impact on the forest. The National Association of State Forester (NASF) recently released publication, <i>Protecting The Nation's Water: State Forestry Agencies and Best Management Practices</i>. The publication covers all 50 US States and eight of its territories. The state forestry BMP implementation rates for the Waycross supply base area are listed in the preamble and the NASF publication concluded.</p> <p>"Across the country, BMP's are implemented appropriately, when and where they are needed, 92% of the time. This is a figure not only one state forestry agency can be proud of: it serves as strong evidence in support of a silvicultural exemption to Clean Water Act permitting requirements".</p> <p>Links to state BMP websites and state specific BMP's for the Waycross supply base area can be found in the preamble.</p> <p><u>Additional evidence</u></p> <p>Enviva contractually requires the use of BMP's. Enviva's Tract Set up process includes a harvest site auditing component to ensure suppliers conform to the requirement. The Forestry Commissions for each state in the supply area monitor and enforce BMP implementation. Additionally, State Forestry Commission's in Enviva's supply area have forestry and wildlife management plans with action item the state is undertaking to improve forest health and wildlife protection on both state and private ownerships.</p> <p><u>Additional evidence</u></p> <p>Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:</p> <ul style="list-style-type: none"> - Illegally harvest wood; - Wood harvested in violation of traditional and civil rights; - Wood harvested from forests where high conservation values are threatened by management activities; - Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use; - Wood from forests where genetically modified trees are planted; - Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.

Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.

ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if forest management activities pose a threat to areas of high conservation value in the supply area. This document uses many of the same sources as the FSC US CWNRA. Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment and this supply base evaluation are reviewed annually to ensure Enviva is aware of changes in the supply base area. The review includes ongoing stakeholder engagement to identify potential new high conservation value areas and evaluation to determine if forest management activities could have a negative impact on these areas. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment and revisions to the Delivered Fiber Agreement.

Primary Feedstock

Enviva uses its proprietary Tract Set up process for all primary wood purchases. Specifically, Enviva maintains a robust tracking and monitoring program to ensure that all our suppliers deliver wood that is sourced according to our expectations. The information Enviva collects for every tract its suppliers harvest includes; data on the forest type, age, GPS coordinates, acreage, and the percent of volume from that tract being sold to Enviva. Before agreeing to accept material from a certain tract, Enviva's Procurement Foresters must obtain this tract-level data and enter it into our database, which generates a unique tract ID. Then, upon delivery to the mill, each load is linked to that tract's ID number. As a result, Enviva knows the tract-level attributes for all the primary wood entering the mill. Enviva conducts random field audits to verify stated forest management objectives are employed. During annual certification audits an independent certifying body confirms Enviva's internal findings as part of its third-party audit assessment. And Enviva's Tract Set up process ensures forest management activities do not harm sensitive eco-systems, habitats or threaten biodiversity in its sourcing practices.

Secondary Feedstock

Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations Document. The process collects information about the suppliers sourcing area, species processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses its Tract Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers.

Enviva's Responsible Sourcing Policy publicly describes Enviva's commitment to avoid wood harvested from forests where high conservation values are threatened by management activities.

	<p>The SFI Fiber Sourcing Standard Objective 1 Biodiversity in Fiber Sourcing requires Program Participants “to address the practice of sustainable forestry by conserving biological diversity”. Enviva’s ENV-SFIS-01 Certified Sourcing Implementation Manual describes processes and internal documents Enviva uses to meet Objective 1, which include partnerships with organizations such as,</p> <p>Enviva and The Longleaf Alliance announced the signing of a five-year partnership to protect and restore longleaf pine forests, one of the most biodiverse ecosystems in North America. Enviva and The Longleaf Alliance will collaboratively implement Enviva’s longleaf forest restoration plan (https://www.envivabiomass.com/enviva-and-the-longleaf-alliance-announce-partnership-to-protect-and-restore-longleaf-pine-forests/)</p> <p>Enviva committed to enhance our ability to detect and monitor HCV areas, finalize our enhanced HCV forest types, and develop procedures for protecting them in harvest operations. As part of the plan, we committed to work with our conservation partners, notably NatureServe, state Natural Heritage programs, and Earthworm Foundation, to identify the full range of HCV types in our sourcing regions using the HCV Network Approach.</p> <p>Enviva entered is working with the Forest Steward Guild to help landowners learn about proper bottomland hardwood management to maintain and enhance these forests for wildlife and water quality protection.</p> <p>Additional information about Enviva’s partnerships can be found on Enviva’s webpage under Responsible Sourcing (https://www.envivabiomass.com/sustainability/responsible-sourcing/responsible-sourcing-policy/#)</p> <p>The PEFC Chain of Custody Standard requires the certificate holder to ensure it knows where feedstocks originate and ensure sourcing practices avoid areas of high conservation value. ENV-PEFCCOC-01 PEFC Chain of Custody and ENV-COC-02 Controlled Wood/Controlled Sources Procedure are Enviva documents describing the workflow to ensure feedstock are legally and sustainably sourced.</p> <p><u>Conclusion</u></p> <p>According to SBP Guidance Document: Assessment of Risk, Means of Verification and Mitigation Measures in the Southeast US, “SBP has yet to receive a Regional Risk Assessment (RRA) for the US to evaluate for approval and considers all of the currently available assessment resources in and of themselves to be only partially adequate in assessing high conservation value and conversion indicators.” Use of the FSC CWNRA is suggested but is considered incomplete.</p> <p>2.1.2 is closely related to 2.1.1 and the Biomass Producers ability to identify and map areas of forest and other high conservation values. And to develop methods to assess the potential impact of forest management activities. This indicator has a presumed specified risk.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. FSC US CWNRA c. ENV-SFIS-01 Certified Sourcing Implementation Manual d. ENV-PEFCCOC-01 PEFC Chain of Custody Procedure e. ENV-COC-02 Controlled Wood/Controlled Sources Procedures f. Supplier Audit Checklist Process g. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment h. Delivered Fiber Agreement

	<ul style="list-style-type: none"> i. Tract Set up process j. Tract Set upProcess k. State BMP Manuals l. Enviva Responsible Sourcing Policy m. NASFPublication, <i>Protecting The Nations Water: State Forestry Agencies and Best Management Practices</i>
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p><u>Management System</u></p> <p>Enviva engages with willing stakeholders to continually assess for potential areas of high conservation value (https://www.greenbiz.com/article/stakeholder-engagement-how-enviva-moved-crisis-collaboration). We find these engagements and subsequent collaborations to be both enlightening and beneficial in the promotion of sustainable forest management. Enviva will annually review it's Means of Verification and include relevant information from its stakeholders to ensure it can accurately identify and map forests and other areas of high conservation values in its supply base area.</p> <p>Enviva's supplier audit processes provide the assessment tools necessary to collect and evaluate a supplier's conformance to Enviva's contractual requirements to determine if the supplier is providing SBP-complaint or SBP-controlled feedstocks. If new high conservation value areas are identified Enviva will work with its stakeholders to determine the best course of action and how to best maintain SBP-compliant sourcing practices.</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> 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	<p>The FSC US CWNRA has identified 10 counties with the supply base area as being at risk for conversion. The FSC US CWNRA only assessed conversion risk based on urbanization and does not include a risk assessment to production plantation or other non-forest uses. Related to forest conversion FSC US CWNRA finds, "Evidence indicates that forestland is growing in the North Central, Northeastern, and Rocky Mountain portions of the United States, while the Southeast and Pacific Coast regions are experiencing forest loss and concurrent rapid population growth. Within the Southeastern United States, the highest rates of urbanization are occurring in the Piedmont region from northern Georgia through North Carolina into Virginia. Forest loss is also occurring along the Atlantic Coast and in eastern Texas. Despite the high rates of urban growth and development across the Southeast, this growth is not consistent across the region."</p> <p>In summary the authors found, "Rates of urban development vary throughout the United States with higher rates in the Pacific Coast Region and portions of the Southeast Region. These two regions are also the regions identified as experiencing more recent forestland loss. Therefore, the greatest risk of materials entering the supply chain from conversions will most likely be in these two regions; however, the risk is not consistent across the regions."</p>

Additional evidence

Enviva partnered with terraPulse Inc., builders of data-driven geospatial solutions, to develop a methodology for assessing the regeneration status of forests that we sourced from in the past. Our post-harvest audits provide us with assurance that the forestland from which we source is being regenerated, but it is not always feasible for Enviva personnel to check the status of all of the harvest sites year after year. Remote sensing allows us to scale our monitoring in order to confirm that our sourcing is achieving our policy goals. Utilizing technology in developing this methodology provided us with valuable insights and better information for making decisions today about how we work with stakeholders to ensure positive harvest outcomes in the forest landscape. Learn more about Enviva's work on conversion related topics on the Enviva Responsible Sourcing webpage (<https://www.envivabiomass.com/sustainability/responsible-sourcing/responsible-sourcing-policy/#>)

Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:

- Illegally harvest wood;
- Wood harvested in violation of traditional and civil rights;
- Wood harvested from forests where high conservation values are threatened by management activities;
- Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use;
- Wood from forests where genetically modified trees are planted;
- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.

Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement. Enviva's Delivered Fiber Agreement specifies suppliers are to avoid all types of land use change or conversion sources of wood when providing feedstocks to Enviva.

The PEFC Chain of Custody Standard requires the certificate holder to ensure it knows where feedstocks originate and ensure wood does not originate from controversial sources. The definition of conversion sources is not as stringent as SBP's relying only on legality compliance. ENV-PEFCCOC-01 PEFC Chain of Custody and ENV-COC-02 Controlled Wood/Controlled Sources Procedure are Enviva documents describing the workflow to ensure feedstock are legally and sustainably sourced.

ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if forest management activities pose a threat to areas of high conservation value in the supply area. This document uses many of the same sources as the FSC US CWNRA. Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment and this supply base evaluation are reviewed annually to ensure Enviva is aware of changes in the supply base area. The review includes ongoing stakeholder engagement to identify trends in land use change and conversion within the supply base area. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement.

	<p>The 2015 Forest2Market Report, <i>Historic Perspectives on the Relationship between Demand and Forest Productivity in the US South</i> concluded annual timberland acres have “remained stable, increasing about 3% from 1953 and 2015”. The report findings are based on information from the USDA Forest Service Forest Inventory Analysis, a long running US inventory including many attributes such as changes in timberland acres. The report also found a correlation between growth in the forest product industry and increases in timberland acres over the same time period.</p> <p><i>Primary Feedstock</i></p> <p>Enviva uses its proprietary Tract Set up process for all primary wood purchases. Specifically, Enviva maintains a robust tracking and monitoring program to ensure that all our suppliers deliver wood that is sourced according to our expectations. The information Enviva collects for every tract its suppliers harvest includes; data on the forest type, age, GPS coordinates, acreage, and the percent of volume from that tract being sold to Enviva. Before agreeing to accept material from a certain tract, Enviva's Procurement Foresters must obtain this tract-level data and enter it into our database, which generates a unique tract ID. Then, upon delivery to the mill, each load is linked to that tract's ID number. As a result, Enviva knows the tract-level attributes for all the primary wood entering the mill. Enviva conducts risk based field sampling audits and verifies feedstocks are not from land use change or conversion sources. During annual certification audits an independent certifying body confirms Enviva's internal findings as part of its third-party audit assessment. And Enviva's Tract Set up process ensures forest management activities do not harm sensitive eco-systems, habitats or threaten biodiversity in its sourcing practices.</p> <p><i>Secondary Feedstock</i></p> <p>Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations Document. The process collects information about the suppliers sourcing area, species processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses its Tract Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers.</p> <p>Enviva does not source from production plantations as defined in the SBP Glossary as "forests of exotic species that have been planted or seeded by human intervention and that are under intensive stand management, are fast growing and subject to short rotations (e.g. Poplar, Acacia or Eucalyptus plantations)."</p> <p><u>Conclusion</u></p> <p>There is a low risk associated with forest conversion in the supply area.</p>
Means of Verification	<ol style="list-style-type: none"> Preamble citations FSC US CWNRA Enviva Responsible Sourcing Policy Historic Perspective on the Relationship between Demand and Forest Productivity in the US South (Forest2Market) ENV-COC-02 Controlled Wood/Controlled Sources Procedure ENV-PEFCCOC-01 PEFC Chain of Custody Procedure Delivered Fiber Agreement

	h. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment i. Tract Set up process j. Tract Set up Process k. Supplier Audit Checklist Process
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.2.1	<p>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.</p>
Finding	<p>The FSC US CWNRA evaluated and determined there are appropriate assessments, planning, implementation and monitoring to determine a low risk rating for this indicator</p> <p>1.1 Land tenure and management rights – “In its report to the Montreal Process Working Group on the Conservation and Management of Temperate and Boreal Forests, in scoring an indicator relating to land tenure, the US government concluded that, “All forest land owners, public and private, exercise their forest tenure rights to achieve their forest land management goals [A]lthough complex, clear title is usually sufficient [to allow forest management] in the United States.”</p> <p>1.3 Management and harvesting planning – Planning requirements for private lands are limited. The author has not been able to find indications of regular violations of these requirements.</p> <p>1.8 Timber harvesting and regulations – The US has ample regulation of the timber industry that varies by state but finds there is a low risk these rules and laws are not followed</p> <p>The FSC US CWNRA cited the Seneca Creek Associates, LLC report entitled, <i>Assessment of Lawful Harvesting & Sustainability of US Hardwood Exports</i>, "States in the hardwood-producing region have very complex and diverse legal authorities over various aspects of forests and each state has crafted its own approach to fostering sustainable forest management."</p> <p>Further it finds, "Many states have implemented voluntary or incentive-based programs to achieve sustainable forestry objectives. Only sporadic information can be found in the formal literature or in media reporting about violations or potential violations of state regulations in the hardwood-producing states. Information that is readily available suggests that state regulatory agencies are not timid about issuing citations or pursuing violators."</p> <p>Additionally, "While states in the hardwood-producing region take different approaches to regulating harvesting and forest practices, the data suggest that all states direct significant resources to forest sustainability issues. The extent of regulation in a given state is not necessarily an indication of how well forests are managed, but it does relate to legal compliance with state laws and thus the legality of hardwood production. The available</p>

data suggest that states in the hardwood region are diligent about enforcing regulations that affect forest practices."

The Endangered Species Act was enacted in 1973 to ensure threatened and endangered plant and animal species and their habitats could receive the necessary support for conservation. The Act is primarily managed and enforced by the US Fish & Wildlife Service (<https://www.fws.gov/endangered/laws-policies/>). The US Fish & Wildlife Service states, "Under the ESA, species may be listed as either endangered or threatened. "Endangered" means a species is in danger of extinction throughout all or a significant portion of its range. "Threatened" means a species is likely to become endangered within the foreseeable future. All species of plants and animals, except pest insects, are eligible for listing as endangered or threatened. For the purposes of the ESA, Congress defined species to include subspecies, varieties, and, for vertebrates, distinct population segments."

In a peer reviewed publication entitled, "The Effectiveness of the Endangered Species Act: A Quantitative Analysis" (BioScience (2005), Vol. 55 Is. 4(1): 360-367.) authors Martin et al. found the Act to be vigorously enforced.

The National Association of State Forester (NASF) recently released publication, *Protecting The Nation's Water: State Forestry Agencies and Best Management Practices*. The publication covers all 50 US States and eight of its territories. The state forestry BMP implementation rates for the Waycross supply base area are listed in the appendix and the NASF publication concluded.

"Across the country, BMP's are implemented appropriately, when and where they are needed, 92% of the time. This is a figure not only one state forestry agency can be proud of: it serves as strong evidence in support of a silvicultural exemption to Clean Water Act permitting requirements".

Links to state BMP websites and state specific BMP implementation rates for the Waycross supply base area can be found in the preamble.

Additional information:

Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:

- Illegally harvest wood;
- Wood harvested in violation of traditional and civil rights;
- Wood harvested from forests where high conservation values are threatened by management activities;
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- Wood from forests where genetically modified trees are planted;
- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.
-

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Most of the high conservation value areas identified in Enviva's supply base area are associated with streams or water features. Forestry BMP's are the best tool available to

ensure forest management activities do not adversely impact forests and other areas of high conservation value such as those identified. And even in areas not associated with streams or water features forestry BMP's specify how roads, trails and other forest management activities are performed to minimize their impact on the forest. Enviva contractually requires the use of BMP's. Enviva's Tract Set up process includes a harvest site auditing component to ensure suppliers conform to the requirement. The Forestry Commissions for each state in the supply area monitor and enforce BMP implementation.

ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure Enviva is aware of forest impact assessments, planning implementation and monitoring efforts in all of Enviva's supply areas. Enviva reviews sources such those listed in the preamble to conduct a state by state study of its supply area. The analysis indicates there are ample state and regional forest assessment tools that help determine forestry regulations within the supply base area. Many of these are the same sources of information used by FSC in its FSC US CWNRA. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Sources Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement

SFI Fiber Sourcing Standard Objective 7 requires a certificate holder to be "knowledgeable about credible regional conservation planning and priority-setting efforts that include a broad range of stakeholders and have a program to take into account the results of these efforts in planning." Enviva does this through engaging state forestry associations.

Primary Feedstock

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Secondary Feedstock

Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations Document. The process collects information about the suppliers sourcing area, species processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses its Tract

	<p>Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers.</p> <p>State Forestry Commission's in Enviva's supply area have forestry and wildlife management plans with action items the state is undertaking to improve forest health and wildlife protection on both state and private ownerships.</p> <p><u>Conclusion</u></p> <p>Enviva's feedstock is sourced from areas with forest impact assessments, planning implementation and monitoring. Based on the available information, the risk for this category has been assessed as low.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. FSC US CWNRA c. ENV-SFIS-01 Certified Sourcing Implementation Manual d. Delivered Fiber Agreement e. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment f. Tract Set up process g. Tract Set up Process h. Supplier Audit Checklist Process i. State BMP Manuals j. Assessment of Lawful Harvesting & Sustainability of US Hardwood Exports k. US Fish & Wildlife Service l. NASF publication, <i>The Nation's Water: State Forestry Agencies and Best Management Practices</i> m. NASF State Forest Fact Sheets n. NASF Water Quality Report o. BioScience website
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk RA <input type="checkbox"/> Unspecified Risk at

	Indicator
2.2.2	<p>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).</p>
Finding	<p>Forest BMP's are designed to protect water quality by preventing the movement of soil into waterways therefore protecting soil quality. Further, many states have specific BMP's that describe methods timber harvesters use to enhance forest soils by redistributing</p> <p>The National Association of State Forester (NASF) recently released publication, <i>Protecting The Nation's Water: State Forestry Agencies and Best Management Practices</i>. The publication covers all 50 US States and eight of its territories. The state forestry BMP implementation rates for the Waycross supply base area are listed in the appendix and the NASF publication concluded.</p> <p>"Across the country, BMP's are implemented appropriately, when and where they are needed, 92% of the time. This is a figure not only one state forestry agency can be proud of: it serves as strong evidence in support of a silvicultural exemption to Clean Water Act permitting requirements".</p> <p>Links to state BMP websites and state specific BMP implementation rates for the Waycross supply base area can be found in the preamble.</p> <p>Enviva reviews sources such as the National Association of State Foresters, USFS Forest Inventory Analysis, World Wildlife Fund, Conservation International and World Resources</p>

Institute to conduct a state by state study of its supply area. The analysis indicates there are ample state and regional forest assessment tools that help determine forestry regulations within the supply base area. The analysis determined the wood products industry is well established, logger training is an industry norm and the use of forestry best management practices are a long-standing business practice in the supply base area.

State Forestry Agency/Commission are also responsible for implementing forestry BMP's as directed by the Clean Water Act and conducting periodic BMP implementation monitoring. State-wide BMP compliance reports are readily available. The NASF website contains many useful reports including, *Effectiveness of forestry BMP's in the United States: Literature Review*, which was published in Forest Ecology and Management (2016: 133 - 151). The review determined forestry BMP's are effective when implemented as recommended by state forestry agencies. Proper implementation of forestry BMP's protect soil quality.

The United States Department of Agriculture Forest Service General Technical Report INT-69 titled, *Forest Soil Biology - Timber Harvesting Relationships: A Perspective*, concluded generally timber harvesting does not have a long-term impact on forest soil productivity and if changes do exist these are generally small and only last a few years.

Additional evidence

Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:

- Illegally harvest wood;
- Wood harvested in violation of traditional and civil rights;
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Most of the high conservation value areas identified in Enviva's supply base area are associated with streams or water features. Forestry BMP's are the best tool available to ensure forest management activities do not adversely impact forests and other areas of high conservation value such as those identified. And even in areas not associated with streams or water features forestry BMP's specify how roads, trails and other forest management activities are performed to minimize their impact on the forest. Enviva contractually requires the use of BMP's. Enviva's Tract Set up process includes a harvest site auditing component to ensure suppliers conform to the requirement. The Forestry Commissions for each state in the supply area monitor and enforce BMP implementation.

Primary Feedstock

	<p>Enviva uses its proprietary Tract Set up process for all primary wood purchases. Specifically, Enviva maintains a robust tracking and monitoring program to ensure that all our suppliers deliver wood that is sourced according to our expectations. The information Enviva collects for every tract its suppliers harvest includes; data on the forest type, age, GPS coordinates, acreage, and the percent of volume from that tract being sold to Enviva. Before agreeing to accept material from a certain tract, Enviva's Procurement Foresters must obtain this tract-level data and enter it into our database, which generates a unique tract ID. Then, upon delivery to the mill, each load is linked to that tract's ID number. As a result, Enviva knows the tract-level attributes for all the primary wood entering the mill. Enviva conducts risk based field sampling audits and verifies forestry BMP's are used and the removal of forest residues do not have a negative impact on soil quality. During annual certification audits an independent certifying body confirms Enviva's internal findings as part of its third-party audit assessment.</p> <p><i>Secondary Feedstock</i></p> <p>Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations Document. The process collects information about the suppliers sourcing area, species processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses its Tract Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers.</p> <p>SFI Fiber Sourcing Standard Objective 2 requires a certificate holder, "To broaden the practice of sustainable forestry through the use of best management practices to protect water quality". Enviva's ENV-SFIS-01 Certified Sourcing Implementation Manual describes processes and internal documents Enviva uses to meet the Objective. Enviva requires the use of forestry best management practices of its suppliers and further requires them to require forestry best management practices be employed by their suppliers.</p> <p><u>Conclusion</u></p> <p>There is a low risk the Enviva sourcing practices will degrade forest soils.</p>
Means of Verification	<ol style="list-style-type: none"> Preamble citations ENV-SFIS-01 Certified Sourcing Implementation Manual Tract Set up process Tract Set upProcess Supplier Audit Checklist Process Delivered Fiber Agreement State BMP Manuals NASF publication, <i>The Nation's Water: State Forestry Agencies and Best Management Practices</i> NASF Water Quality Report BMP implementation rate information for states in supply base area Effectiveness of forestry BMP's in the United States: Literature Review. Forest Soil Biology - Timber Harvesting Relationships: A Perspective

Evidence Reviewed	All means of verification reviewed
Risk Rating	X Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> 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	<p>The FSC US CWNRA finding related to this indicator</p> <p>1.9 Protected sites and species – “The US has a broad and comprehensive legal structure surrounding species protection and the protection of socially and ecologically important sites, administered at both the federal and state level.”</p> <p>Using the FSC US CWNRA Enviva has identified the following key ecosystems and habitats that are at risk. Those CBA’s are listed in indicator 2.1.1 and examples of most at risk key ecosystems and habitats are protected by federal and state agencies.</p> <p><u>Additional evidence</u></p> <p>Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:</p> <ul style="list-style-type: none"> - Illegally harvest wood; - Wood harvested in violation of traditional and civil rights; - Wood harvested from forests where high conservation values are threatened by management activities; - Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use; - Wood from forests where genetically modified trees are planted; - Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work. <p>Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva’s legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.</p> <p>ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure it Enviva is aware of forest impact assessments, planning implementation and monitoring efforts including an analysis of ecosystem and habitats in all of Enviva's supply areas. The program requires an assessment of each risk area to determine if forest management activities are impacting eco-regions of significant high conservation values. Enviva reviews sources such as those listed in the preamble to evaluate its supply base area. The analysis indicates there are ample state and regional forest assessment tools that help determine forestry regulations within the supply base area. The analysis also finds the wood products industry is well established, logger training is an industry norm and the use of forestry best management practices are a long-standing business practice</p>

in the supply base area. These same sources were used by the authors of the FSC US CWNRA.

Many areas of high conservation value are found in conjunction with rivers, streams, etc. SFI Fiber Sourcing Standard Objective 2 indicator 2.1 requires Program Participants to develop a verifiable monitoring system to ensure BMP's are evaluated across its wood supply area, ensure implementation rates are maintained and identify areas for improvement. Enviva's ENV-SFIS-01 Certified Sourcing Implementation Manual and its Tract Set up process fields audits to meet the requirements. Forestry BMP's are the best tool available to ensure forest management activities do not adversely impact forests and other areas of high conservation value. Enviva contractually requires the use of BMP's. Enviva's Tract Set up process includes a harvest site auditing component to ensure suppliers conform to the requirement.

ENV-SFIS-01 Certified Sourcing Implementation Manual describes processes and internal documents Enviva uses to meet the SFI requirements related to Objective 1 "Biodiversity in Fiber Sourcing. To address the practice of sustainable forestry by conserving biological diversity".

Enviva and The Longleaf Alliance announced the signing of a five-year partnership to protect and restore longleaf pine forests, one of the most biodiverse ecosystems in North America. Enviva and The Longleaf Alliance will collaboratively implement Enviva's longleaf forest restoration plan (<https://www.envivabiomass.com/enviva-and-the-longleaf-alliance-announce-partnership-to-protect-and-restore-longleaf-pine-forests/>)

Enviva committed to enhance our ability to detect and monitor HCV areas, finalize our enhanced HCV forest types, and develop procedures for protecting them in harvest operations. As part of the plan, we committed to work with our conservation partners, notably NatureServe, state Natural Heritage programs, and Earthworm Foundation, to identify the full range of HCV types in our sourcing regions using the HCV Network Approach.

Primary Feedstock

Enviva uses its proprietary Tract Set up process for all primary wood purchases. Specifically, Enviva maintains a robust tracking and monitoring program to ensure that all our suppliers deliver wood that is sourced according to our expectations. The information Enviva collects for every tract its suppliers harvest includes; data on the forest type, age, GPS coordinates, acreage, and the percent of volume from that tract being sold to Enviva. Before agreeing to accept material from a certain tract, Enviva's Procurement Foresters must obtain this tract-level data and enter it into our database, which generates a unique tract ID. Then, upon delivery to the mill, each load is linked to that tract's ID number. As a result, Enviva knows the tract-level attributes for all the primary wood entering the mill. And Enviva's Tract Set up process ensures forest management activities do not harm sensitive eco-systems, habitats or threaten biodiversity in its sourcing practices. Enviva conducts risk based field sampling audits and verifies feedstocks are not sourced from areas of high conservation value. During annual certification audits an independent certifying body confirms Enviva's internal findings as part of its third-party audit assessment.

Secondary Feedstock

Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations

	<p>Document. The process collects information about the suppliers sourcing area, species processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses its Tract Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers.</p> <p><u>Conclusion</u></p> <p>According to SBP Guidance Document: Assessment of Risk, Means of Verification and Mitigation Measures in the Southeast US, "SBP has yet to receive a Regional Risk Assessment (RRA) for the US to evaluate for approval and considers all of the currently available assessment resources in and of themselves to be only partially adequate in assessing high conservation value and conversion indicators." Use of the FSC CWNRA is suggested but is considered incomplete.</p> <p>Enviva engages with willing stakeholders to continually assess for potential areas of high conservation value (https://www.greenbiz.com/article/stakeholder-engagement-how-enviva-moved-crisis-collaboration). We find these engagements and subsequent collaborations to be both enlightening and beneficial in the promotion of sustainable forest management.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. FSC US CWNRA c. Enviva Sourcing Policy d. ENV-SFIS-01 Certified Sourcing Implementation Manual e. ENV-COC-03 Controlled Source Risk Assessment f. Tract Set up process g. Tract Set up Process h. Supplier Audit Checklist Process i. Stakeholder engagement j. Delivered Fiber Agreement
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p><u>Management System</u></p> <p>Enviva will annually review its Means of Verification, engage with Stakeholders, use its , Tract Set up process and Supplier Audit Checklist Process to ensure key ecosystems and habitats are or conserved or set aside.</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> 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	<p>Using the FSC US CWNRA Enviva identified the following Critical Biodiversity Areas (CBA) within the Enviva supply base area:</p> <p>Florida Panhandle Critical Biodiversity Area – located in all or parts of 9 counties of Enviva's supply base are the Florida Panhandle CBA is reported to be one of the 5 richest biodiversity hotspots in North America. Of particular importance is the richness of frogs (27 species), snakes (42 species) and turtles (18 species) [Source: 49]. This concentration of biodiversity is driven by the river systems (particularly the Apalachicola River), longleaf pine savanna habitat and unique steephead ravines. Species of particular interest include the Okaloosa darter (<i>Etheostoma okaloosae</i>) which is endemic to the Florida Panhandle, and the Red-cockaded Woodpecker (<i>Picoides borealis</i>) which is associated with the longleaf pine.</p> <p>Central Florida Critical Biodiversity Area – located in the southern most reach of Enviva's supply base area in parts of 6 counties in Enviva's this CBA contains native pine ecosystems are an important driver for biodiversity. Pine flatwoods in Central Florida are associated with xeric uplands/sandhills that provide a range of biodiversity values. Longleaf pine is the dominant tree species in pine flatwoods, however as with other longleaf pine systems, the native plant diversity is one of the most significant components of the overall biodiversity. Rare wildlife supported by this habitat include Florida black bear (<i>Ursus americanus floridanus</i>), Florida panther (<i>Felis concolor coryi</i>), Southeastern kestrel (<i>Falco sparverius paulus</i>), Red-cockaded Woodpecker (<i>Picoides borealis</i>), Florida sandhill crane (<i>Grus canadensis pratensis</i>), Bald eagle (<i>Haliaeetus leucocephalus</i>), eastern indigo snake (<i>Drymarshon corais couperi</i>), and Chapman's rododendron (<i>Rhododendron chapmanii</i>).</p> <p>Native Longleaf Pine Systems – found throughout much of the Enviva supply area. Native longleaf systems threats vary across its natural range with suppression of fire being the greatest concern. Other concerns include conversion to other pine types and incompatible forest management practices.</p> <p>Late Successional Bottomland Hardwoods – found throughout the south in the floodplains of rivers and streams the forests are periodically flooded or saturated. Variations in structure are determined by the location of the late successional bottomland forest. Generally, 80 years or older the forest is better defined by structure; closed canopy, large wood debris, standing hollow trees and little ground vegetation. Bottomland forests in Mississippi are reduced in size and area from historic clearing to create agricultural fields. Changes in hydrology, improper forest management techniques and invasive species. Forest management in and of itself may not be a threat but how the management is applied can be counterproductive.</p> <p><u>Additional evidence</u></p> <p>Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:</p> <ul style="list-style-type: none"> - Illegally harvest wood; - Wood harvested in violation of traditional and civil rights;

- Wood harvested from forests where high conservation values are threatened by management activities;
- Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use;
- Wood from forests where genetically modified trees are planted;
- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.

Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.

Most of areas of high biodiversity identified in Enviva's supply base area are associated with streams or water features. Forestry BMP's are the best tool available to ensure forest management activities do not adversely impact forests and other areas of high conservation value such as those identified. And even in areas not associated with streams or water features forestry BMP's specify how roads, trails and other forest management activities are performed to minimize their impact on the forest. Enviva contractually requires the use of BMP's. Enviva's Tract Set up process includes a harvest site auditing component to ensure suppliers conform to the requirement. The Forestry Commissions for each state in the supply area monitor and enforce BMP implementation.

The National Association of State Foresters (NASF) recently released publication, *Protecting The Nation's Water: State Forestry Agencies and Best Management Practices*. The publication covers all 50 US States and eight of its territories. The state forestry BMP implementation rates for the Waycross supply base area are listed in the appendix and the NASF publication concluded.

"Across the country, BMP's are implemented appropriately, when and where they are needed, 92% of the time. This is a figure not only one state forestry agency can be proud of: it serves as strong evidence in support of a silvicultural exemption to Clean Water Act permitting requirements".

Links to state BMP websites and state specific BMP implementation rates for the Waycross supply base area can be found in the preamble.

Longleaf pine forests are a critical forest ecosystem in the southeastern U.S. They are considered high conservation value forests because of their rarity and biodiversity value. Longleaf forests support some of the highest levels of small-scale species diversity of any forest ecosystem in North America. Well-managed longleaf pine forests provide critical habitat for 29 threatened and endangered species, including the red-cockaded woodpecker, the gopher tortoise, and the Eastern indigo snake.

Enviva and The Longleaf Alliance announced the signing of a five-year partnership to protect and restore longleaf pine forests, one of the most biodiverse ecosystems in North America. Enviva and The Longleaf Alliance will collaboratively implement Enviva's longleaf forest restoration plan (<https://www.envivabiomass.com/enviva-and-the-longleaf-alliance-announce-partnership-to-protect-and-restore-longleaf-pine-forests/>)

ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure Enviva is aware of forest impact assessments, planning implementation and monitoring efforts in all of Enviva's supply areas. Enviva reviews sources such those listed in the preamble as the National Association of State Foresters, USFS Forest Inventory

Analysis, World Wildlife Fund, Conservation International and World Resources Institute to conduct a state by state study of its supply area. The analysis indicates there are ample state and regional forest assessment tools that help determine forestry regulations within the supply base area. Many of these are the same sources of information used by FSC in its FSC US CWNRA. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Sources Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement

ENV-SFI-01 SFI Certified Sourcing Implementation Manual describes processes and internal documents Enviva uses to meet the SFI requirements related to Objective 1 "Biodiversity in Fiber Sourcing. To address the practice of sustainable forestry by conserving biological diversity".

Enviva committed to enhance our ability to detect and monitor HCV areas, finalize our enhanced HCV forest types, and develop procedures for protecting them in harvest operations. As part of the plan, we committed to work with our conservation partners, notably NatureServe, state Natural Heritage programs, and Earthworm Foundation, to identify the full range of HCV types in our sourcing regions using the HCV Network Approach.

Enviva entered is working with the Forest Steward Guild to help landowners learn about proper bottomland hardwood management to maintain and enhance these forests for wildlife and water quality protection.

Primary Feedstock

Enviva uses its proprietary Tract Set up process for all primary wood purchases. Specifically, Enviva maintains a robust tracking and monitoring program to ensure that all our suppliers deliver wood that is sourced according to our expectations. The information Enviva collects for every tract its suppliers harvest includes; data on the forest type, age, GPS coordinates, acreage, and the percent of volume from that tract being sold to Enviva. Before agreeing to accept material from a certain tract, Enviva's Procurement Foresters must obtain this tract-level data and enter it into our database, which generates a unique tract ID. Then, upon delivery to the mill, each load is linked to that tract's ID number. As a result, Enviva knows the tract-level attributes for all the primary wood entering the mill. Enviva conducts risk based field sampling audits and verifies feedstocks are not sourced in a manner that threatens biodiversity. During annual certification audits an independent certifying body confirms Enviva's internal findings as part of its third-party audit assessment. And Enviva's Tract Set up process ensures forest management activities do not harm sensitive eco-systems, habitats or threaten biodiversity in its sourcing practices.

Secondary Feedstock

Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations Document. The process collects information about the suppliers sourcing area, species processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses its Tract

	<p>Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers.</p> <p><u>Conclusion</u></p> <p>According to SBP Guidance Document: Assessment of Risk, Means of Verification and Mitigation Measures in the Southeast US, "SBP has yet to receive a Regional Risk Assessment (RRA) for the US to evaluate for approval and considers all of the currently available assessment resources in and of themselves to be only partially adequate in assessing high conservation value and conversion indicators." Use of the FSC CWNRA is suggested but is considered incomplete.</p> <p>Enviva engages with willing stakeholders to continually assess for potential areas of high conservation value (https://www.greenbiz.com/article/stakeholder-engagement-how-enviva-moved-crisis-collaboration). We find these engagements and subsequent collaborations to be both enlightening and beneficial in the promotion of sustainable forest management.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. FSC CWNRA c. ENV-SFIS-01 Certified Sourcing Implementation Manual d. Tract Set up process e. Tract Set up Process f. Supplier Audit Checklist Process g. ENV-COC-03 Controlled Wood/Controlled Sources Risk Assessment h. Delivered Fiber Agreement i. National Association of State Foresters j. Enviva Responsible Sourcing Policy k. NASF publication, <i>The Nation's Water: State Forestry Agencies and Best Management Practices</i>
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p><u>Management System</u></p> <p>Enviva will annually review it's Means of Verification, engage with Stakeholders, use its Tract Set up process and Supplier Audit Checklist Process to ensure key ecosystems and habitats are or conserved or set aside.</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> 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	<p>The United States. The United States Department of Agriculture Forest Service General Technical Report INT-69 titled, <i>Forest Soil Biology - Timber Harvesting Relationships: A Perspective</i>, concluded generally timber harvesting does not have a long-term impact on forest soil productivity and if changes do exist these are generally small and only last a few years.</p> <p>Enviva reviews sources such as the National Association of State Foresters, USFS Forest Inventory Analysis, World Wildlife Fund, Conservation International and World Resources</p>

Institute to conduct a state by state study of its supply area. The analysis indicates there are ample state and regional forest assessment tools that help determine forestry regulations within the supply base area. The analysis determined the wood products industry is well established, logger training is an industry norm and the use of forestry best management practices are a business is a best practice in the supply base area.

Forestry BMP's are the best tool available to ensure forest management activities do not adversely impact forests. Enviva contractually requires the use of BMP's. Enviva's Tract Set up process includes a harvest site auditing component to ensure suppliers conform to the requirement.

The Forestry Commissions for each state in the supply area monitor and enforce BMP implementation. The NASF website contains many useful reports including, *Effectiveness of forestry BMP's in the United States: Literature Review*. Published in Forest Ecology and Management (2016, pgs 133 - 151). The review determined forestry BMP's are effective when implemented as recommended by state forestry agencies. Proper implementation of forestry BMP's protect soil quality.

Forest BMP's are designed to protect water quality by preventing the movement of soil into waterways therefore protecting soil quality. Further, many states have specific BMP's that describe methods timer harvesters use to enhance forest soils by redistributing. The National Association of State Forester (NASF) recently released publication, *Protecting The Nation's Water: State Forestry Agencies and Best Management Practices*. The publication covers all 50 US States and eight of its territories. The state forestry BMP implementation rates for the Waycross supply base area are listed in the appendix and the NASF publication concluded.

"Across the country, BMP's are implemented appropriately, when and where they are needed, 92% of the time. This is a figure not only one state forestry agency can be proud of: it serves as strong evidence in support of a silvicultural exemption to Clean Water Act permitting requirements".

Links to state BMP websites and state specific BMP implementation rates for the Waycross supply base area can be found in the preamble.

Additional evidence

Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood.

- Illegally harvest wood;
- Wood harvested in violation of traditional and civil rights;
- Wood harvested from forests where high conservation values are threatened by management activities;
- Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use;
- Wood from forests where genetically modified trees are planted;
- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.

Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. The Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.

	<p>ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if removals of forest residues have a negative influence on forests in the supply area. This document uses many if the same sources as the FSC US CWNRA. Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment and this supply base evaluation are reviewed annually to ensure Enviva is aware of changes in the supply base area. The review includes ongoing stakeholder engagement to identify potential new high conservation value areas and evaluation to determine if forest management activities could have a negative impact on these areas. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement.</p> <p><i>Primary Feedstock</i></p> <p>Enviva uses its proprietary Tract Set up process for all primary wood purchases. Specifically, Enviva maintains a robust tracking and monitoring program to ensure that all our suppliers deliver wood that is sourced according to our expectations. The information Enviva collects for every tract its suppliers harvest includes; data on the forest type, age, GPS coordinates, acreage, and the percent of volume from that tract being sold to Enviva. Before agreeing to accept material from a certain tract, Enviva's Procurement Foresters must obtain this tract-level data and enter it into our database, which generates a unique tract ID. Then, upon delivery to the mill, each load is linked to that tract's ID number. As a result, Enviva knows the tract-level attributes for all the primary wood entering the mill. Enviva conducts risk based field sampling audits and verifies feedstocks are not sourced in a manner that could harm ecosystems. During annual certification audits an independent certifying body confirms Enviva's internal findings as part of its third-party audit assessment. And Enviva's Tract Set up process ensures forest management activities do not harm sensitive eco-systems, habitats or threaten biodiversity in its sourcing practices.</p> <p><i>Secondary Feedstock</i></p> <p>Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations Document. The process collects information about the suppliers sourcing area, species processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses its Tract Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers.</p> <p><u>Conclusion</u></p> <p>There is a low risk the Enviva sourcing practices will affect residue removal from forests.</p>
Means of Verification	<ol style="list-style-type: none"> Preamble citations ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment Delivered Fiber Agreement Tract Set up process Supplier Audit Checklist Process Tract Set upProcess State BMP Manuals and BMP monitoring data BMP implementation rate information for states in supply base area

	i. Effectiveness of forestry BMP's in the United States: Literature Review. j. Forest Soil Biology - Timber Harvesting Relationships: A Perspective k. NASF publication, <i>The Nation's Water: State Forestry Agencies and Best Management Practices</i>
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.2.6	<p>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).</p>
Finding	<p>The FSC US CWNRA indicator 3.4 HCV 4 determined there is a low risk of forest management activities affecting water quality. Further the author states, "Evidence of the effectiveness of forestry BMPs, combined with the reported levels of compliance, indicates that there is a high likelihood that HCV 4 are being effectively protected throughout the assessment area through the implementation of forestry BMPs associated with State nonpoint source pollution programs." The effectiveness of forestry best management practices is well documented in the FSC US CWNRA.</p> <p>The US Clean Water Act requires each state to develop non-point source BMP's to address run off. This includes forestry activities. Enviva's contracts require suppliers to ensure their supply chain follows all applicable laws including those that protect special habitats by following BMP's and other laws.</p> <p>The National Association of State Forester (NASF) recently released publication, <i>Protecting The Nation's Water: State Forestry Agencies and Best Management Practices</i>. The publication covers all 50 US States and eight of its territories. The state forestry BMP implementation rates for the Waycross supply base area are listed in the appendix and the NASF publication concluded.</p> <p>"Across the country, BMP's are implemented appropriately, when and where they are needed, 92% of the time. This is a figure not only one state forestry agency can be proud of: it serves as strong evidence in support of a silvicultural exemption to Clean Water Act permitting requirements".</p> <p>Links to state BMP websites and state specific BMP implementation rates for the Waycross supply base area can be found in the preamble.</p> <p><u>Additional evidence</u></p> <p>Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:</p> <ul style="list-style-type: none"> - Illegally harvest wood; - Wood harvested in violation of traditional and civil rights; - Wood harvested from forests where high conservation values are threatened by management activities; - Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use; - Wood from forests where genetically modified trees are planted;

- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.

Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.

ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if forest management activities pose a threat to water quality in the supply area. This document uses many of the same sources as the FSC US CWNRA. Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment and this supply base evaluation are reviewed annually to ensure Enviva is aware of changes in the supply base area. The review includes annual reviews of state forestry BMP studies to incorporate state findings into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement.

Enviva reviews sources such as the National Association of State Foresters, USFS Forest Inventory Analysis, World Wildlife Fund, Conservation International and World Resources Institute to conduct a state by state study of its supply area. The analysis indicates there are ample state and regional forest assessment tools that help determine forestry regulations within the supply base area. The analysis determined the wood products industry is well established, logger training is an industry norm and the use of forestry best management practices are a long-standing business practice in the supply base area.

Enviva is a member of state forestry associations within its supply base area and these organizations are responsible for reviewing and developing logger training in conjunction with state forestry commissions related to forestry best management practices. Enviva interacts with these groups to improve forestry best management practices guidelines and monitor enforcement. Forestry BMP's are the best tool available to ensure forest management activities do not adversely impact forests and other areas of high conservation value such as those identified. And even in areas not associated with streams or water features forestry BMP's specify how roads, trails and other forest management activities are performed to minimize their impact on the forest. Enviva contractually requires the use of BMP's. Enviva's Tract Set up process includes a harvest site auditing component to ensure suppliers conform to the requirement. The Forestry Commissions for each state in the supply area monitor and enforce BMP implementation.

Enviva is an SFI Program Participant certified to SFI's Fiber Sourcing Standard. Objective 2 requires Program Participants to mandate the use and monitor the implementation of forestry BMP's to protect water quality. Enviva's ENV-SFIS-01 Certified Sourcing Implementation Manual describes how Tract Set up process and its harvest site inspection process fulfills the Objective as well as SFI Fiber Sourcing Standard Objective 3 requiring Program Participants to promote the use of trained logger.

Primary Feedstock

Enviva uses its proprietary Tract Set up process for all primary wood purchases. Specifically, Enviva maintains a robust tracking and monitoring program to ensure that all our suppliers deliver wood that is sourced according to our expectations. The information Enviva collects for every tract its suppliers harvest includes; data on the forest type, age, GPS coordinates, acreage, and the percent of volume from that tract being sold to Enviva.

	<p>Before agreeing to accept material from a certain tract, Enviva's Procurement Foresters must obtain this tract-level data and enter it into our database, which generates a unique tract ID. Then, upon delivery to the mill, each load is linked to that tract's ID number. As a result, Enviva knows the tract-level attributes for all the primary wood entering the mill. Enviva conducts risk based field sampling audits and verifies feedstocks harvesting does not impact ground water quality. During annual certification audits an independent certifying body confirms Enviva's internal findings as part of its third-party audit assessment. And Enviva's Tract Set up process ensures forest management activities do not harm sensitive eco-systems, habitats or threaten biodiversity in its sourcing practices.</p> <p><i>Secondary Feedstock</i></p> <p>Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations Document. The process collects information about the suppliers sourcing area, species processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses its Tract Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers.</p> <p><u>Conclusion</u></p> <p>There is a low risk the Enviva's sourcing practices will have a negative impact on water quality.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. FSC US CWNRA c. NASF publication, <i>The Nation's Water: State Forestry Agencies and Best Management Practices</i> d. ENV-SFIS-01 Certified Sourcing Implementation Manual e. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment f. State BMP Manuals and BMP monitoring data g. Delivered Fiber Agreement h. Tract Set up process i. Supplier Audit Checklist Process j. Tract Set up Process k. NASF Water Quality Report l. US Clean Water Act
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> 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	<p>Air quality impacts from forest management activities are generally related to prescribe fire site preparation techniques. State specific prescribed fire regulation websites are listed below.</p> <ul style="list-style-type: none"> Alabama – http://www.forestry.alabama.gov/Pages/Informational/Legal/Prescribed_Burn_Act.aspx Florida – https://www.fdacs.gov/Forest-Wildfire/Wildland-Fire/Prescribed-Fire Georgia – https://gatrees.org/fire-prevention-suppression/prescribed-burn-certification/ South Carolina – https://www.state.sc.us/forest/fire.htm <p>The US Clean Air Act requires each state to implement air quality controls to ensure the public's safety. The USDA Forest Service website, <i>Forest Service Air Management Responsibilities</i> describes how the Clean Air Act affects forestry operations in general. States in the Enviva supply base area have haze/smoke laws that are enforced at the local level.</p> <p>Examples of enforcement of forestry fire laws can be found on the United States Fire Administration website (https://www.usfa.fema.gov/prevention/outreach/wildfire_arson/court_cases.html). And the US Environmental Protection Agency website (https://cfpub.epa.gov/compliance/criminal_prosecution/).</p> <p>Air quality can also be affected by the forest management use of herbicides and pesticides to control unwanted vegetation and insect. State specific herbicide BMP websites are listed below.</p> <ul style="list-style-type: none"> Alabama – http://www.forestry.alabama.gov/Pages/Management/Forms/2007_BMP_Manual.pdf Florida – https://www.fdacs.gov/Forest-Wildfire/Silviculture-Best-Management-Practices Georgia – https://gatrees.org/forest-management-conservation/water-quality-protection/ South Carolina – https://www.state.sc.us/forest/bmpmanual.pdf <p>Though each state has varying guidance for herbicide and pesticide use all use of these chemicals is regulated by the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). FIFRA is a federal statute that governs the registration, distribution, sale, and use of pesticides in the United States. With certain exceptions, a pesticide is any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, or intended for use as a plant regulator, defoliant, or desiccant, or any nitrogen stabilizer.</p> <p>In the United States regulation of forestry practices has its roots in federal law and acts designed to provide minimum guidance to states in developing state specific laws and regulations and ranks in the top 92nd percentile in Regulatory Quality in the World Bank, Worldwide Governance Indicators and in the top 89th percentile in Rule of Law. Chemical use in forest management activities also follow EPA guidance under FIFRA and include in-woods practices. A review of the EPA Civil Cases and Settlements by Statute resulted in no</p>

	<p>findings related to forest management activities. The United States has a robust legal system that deters the abuse of state and federal regulation.</p> <p><u>Additional evidence</u></p> <p>Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:</p> <ul style="list-style-type: none"> - Illegally harvest wood; - Wood harvested in violation of traditional and civil rights; - Wood harvested from forests where high conservation values are threatened by management activities; - Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use; - Wood from forests where genetically modified trees are planted; - Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work. <p>Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.</p> <p>Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment and this supply base evaluation are reviewed annually to ensure it Enviva is aware of forest impact assessments, planning implementation and monitoring efforts of forestry best management practices including regulations related to forest management activities effect on air quality in all of Enviva's supply areas.</p> <p>Enviva reviews sources such as the National Association of State Foresters, USFS Forest Inventory Analysis, World Wildlife Fund, Conservation International and World Resources Institute to conduct a state by state study of its supply area. The analysis indicates there are ample state and regional forest assessment tools that help determine forestry regulations within the supply base area. All states in the supply area have forestry regulations pertaining to the use of fire as a silvicultural tool. The analysis determined the wood products industry is well established, logger training is an industry norm and the use of forestry best management practices are a long-standing business practice in the supply base area.</p> <p>Enviva is a member of regional state forestry associations responsible for reviewing and developing logger training in conjunction with state forestry commissions related to forestry best manage practices. Enviva interacts with these groups to improve forestry best management practices guidelines and monitor enforcement including air quality from forest management.</p> <p><i>Primary Feedstock</i></p> <p>Enviva uses its proprietary Tract Set up process for all primary wood purchases. Specifically, Enviva maintains a robust tracking and monitoring program to ensure that all our suppliers deliver wood that is sourced according to our expectations. The information Enviva collects for every tract its suppliers harvest includes; data on the forest type, age, GPS coordinates, acreage, and the percent of volume from that tract being sold to Enviva. Before agreeing to accept material from a certain tract, Enviva's Procurement Foresters must obtain this tract-level data and enter it into our database, which generates a unique tract ID. Then, upon delivery to the mill, each load is linked to that tract's ID number. As a result, Enviva knows the tract-level attributes for all the primary wood entering the mill. Enviva conducts risk based</p>
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	<p>field sampling audits and verifies feedstocks are not sourced from areas without forestry regulations governing air quality. During annual certification audits an independent certifying body confirms Enviva's internal findings as part of its third-party audit assessment. And Enviva's Tract Set up process ensures forest management activities do not harm sensitive eco-systems, habitats or threaten biodiversity in its sourcing practices.</p> <p><i>Secondary Feedstock</i></p> <p>Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations Document. The process collects information about the suppliers sourcing area, species processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses its Tract Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers.</p> <p><u>Conclusion</u></p> <p>There is a low risk the Enviva sourcing practices will have a negative impact on air quality.</p>
Means of Verification	<ol style="list-style-type: none"> Preamble citations Delivered Fiber Agreement ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment Tract Set up process Supplier Audit Checklist Process Tract Set up Process Clean Air Act State Forestry Regulations USDA Forest Service US EPA FIFRA US Fire Administration World Bank Worldwide Governance Indicators
Evidence Reviewed	All means of verification reviewed
Risk Rating	X Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> 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	<p>Air quality can also be affected by the forest management use of herbicides and pesticides to control unwanted vegetation and insect. State specific herbicide BMP websites are listed below.</p> <ul style="list-style-type: none"> Alabama – http://www.forestry.alabama.gov/Pages/Management/Forms/2007_BMP_Manual.pdf

- Florida – <https://www.fdacs.gov/Forest-Wildfire/Silviculture-Best-Management-Practices>
- Georgia – <https://gatrees.org/forest-management-conservation/water-quality-protection/>
- South Carolina – <https://www.state.sc.us/forest/bmpmanual.pdf>

Though each state has varying guidance for herbicide and pesticide use all use of these chemicals is regulated by the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). FIFRA is a federal statute that governs the registration, distribution, sale, and use of pesticides in the United States. With certain exceptions, a pesticide is any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, or intended for use as a plant regulator, defoliant, or desiccant, or any nitrogen stabilizer.

Examples of enforcement of Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) can be found on the United States Environmental Protection Agency website (https://cfpub.epa.gov/compliance/criminal_prosecution/).

Information about Integrated Pest Management can be found on the USDA Forest Service website (<https://www.fs.fed.us/foresthealth/protecting-forest/integrated-pest-management/>).

In the United States regulation of forestry practices has its roots in federal law and acts designed to provide minimum guidance to states in developing state specific laws and regulations and ranks in the top 92nd percentile in Regulatory Quality in the World Bank, Worldwide Governance Indicators and in the top 89th percentile in Rule of Law. Chemical use in forest management activities also follow EPA guidance under FIFRA and include in-woods practices. A review of the EPA Civil Cases and Settlements by Statute resulted in no findings related to forest management activities. The United States has a robust legal system that deters the abuse of state and federal regulation.

Additional evidence

Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:

- Illegally harvest wood;
- Wood harvested in violation of traditional and civil rights;
- Wood harvested from forests where high conservation values are threatened by management activities;
- Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use;
- Wood from forests where genetically modified trees are planted;
- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.

Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.

Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment and this supply base evaluation are reviewed annually to ensure it Enviva is aware of forest impact

	<p>assessments, planning implementation and monitoring efforts, forestry best management practices in all of Enviva's supply areas.</p> <p>Enviva reviews sources such as the National Association of State Foresters, USFS Forest Inventory Analysis, World Wildlife Fund, Conservation International and World Resources Institute to conduct a state by state study of its supply area. The analysis indicates there are ample state and regional forest assessment tools that help determine forestry regulations within the supply base area. The analysis determined the wood products industry is well established, logger training is an industry norm and the use of forestry best management practices are a long-standing business practice in the supply base area. Findings are incorporated into Enviva's ENV-COC-03 Controlled Sources Risk Assessment and revisions to the Delivered Fiber Agreement.</p> <p><i>Primary Feedstock</i></p> <p>Enviva uses its proprietary Tract Set up process for all primary wood purchases. Specifically, Enviva maintains a robust tracking and monitoring program to ensure that all our suppliers deliver wood that is sourced according to our expectations. The information Enviva collects for every tract its suppliers harvest includes; data on the forest type, age, GPS coordinates, acreage, and the percent of volume from that tract being sold to Enviva. Before agreeing to accept material from a certain tract, Enviva's Procurement Foresters must obtain this tract-level data and enter it into our database, which generates a unique tract ID. Then, upon delivery to the mill, each load is linked to that tract's ID number. As a result, Enviva knows the tract-level attributes for all the primary wood entering the mill. Enviva conducts risk based field sampling audits and verifies feedstocks are not from land where forest chemicals are used in excess. During annual certification audits an independent certifying body confirms Enviva's internal findings as part of its third-party audit assessments. And Enviva's Tract Set up process ensures forest management activities do not harm sensitive eco-systems, habitats or threaten biodiversity in its sourcing practices.</p> <p><i>Secondary Feedstock</i></p> <p>Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations Document. The process collects information about the suppliers sourcing area, species processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses its Tract Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers.</p> <p><u>Conclusion</u></p> <p>There is a low risk the Enviva sourcing practices will cause an increase in the use of pesticides or herbicides.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. Delivered Fiber Agreement c. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment d. Tract Set up process e. Supplier Audit Checklist Process f. Tract Set upProcess g. USDA Forest Service

	<ul style="list-style-type: none"> h. Federal Insecticide, Fungicide and Rodenticide Act i. US EPA j. World Bank Worldwide Governance Indicators
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	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	<p>Enviva reviews sources such as the National Association of State Foresters, USFS Forest Inventory Analysis, World Wildlife Fund, Conservation International and World Resources Institute to conduct a state by state study of its supply area. The analysis indicates there are ample state and regional forest assessment tools that help determine forestry regulations within the supply base area. The analysis determined the wood products industry is well established, logger training is an industry norm and the use of forestry best management practices are a long-standing best practice in the supply base area.</p> <p>Enviva is a member of state forestry associations within its supply base area and these organizations are responsible for reviewing and developing logger training in conjunction with state forestry commissions related to forestry best manage practices. Enviva interacts with these groups to improve forestry best management practices guidelines and monitor enforcement.</p> <p>The National Association of State Forester (NASF) recently released publication, <i>Protecting The Nation's Water: State Forestry Agencies and Best Management Practices</i>. The publication covers all 50 US States and eight of its territories. The state forestry BMP implementation rates for the Waycross supply base area are listed in the appendix and the NASF publication concluded.</p> <p>“Across the country, BMP’s are implemented appropriately, when and where they are needed, 92% of the time. This is a figure not only one state forestry agency can be proud of: it serves as strong evidence in support of a silvicultural exemption to Clean Water Act permitting requirements”.</p> <p>Links to state BMP websites and state specific BMP implementation rates for the Waycross supply base area can be found in the preamble.</p> <p>In the United States regulation of forestry practices has its roots in federal law and acts designed to provide minimum guidance to states in developing state specific laws and regulations and ranks in the top 92nd percentile in Regulatory Quality in the World Bank, Worldwide Governance Indicators and in the top 89th percentile in Rule of Law. Chemical use in forest management activities also follow EPA guidance under FIFRA and include in-woods practices. A review of the EPA Civil Cases and Settlements by Statute resulted in no findings related to forest management activities. The United States has a robust legal system that deters the abuse of state and federal regulation</p> <p><u>Additional evidence</u></p>

Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:

- Illegally harvest wood;
- Wood harvested in violation of traditional and civil rights;
- Wood harvested from forests where high conservation values are threatened by management activities;
- Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use;
- Wood from forests where genetically modified trees are planted;
- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.

Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.

Enviva is an SFI Program Participant certified to SFI's Fiber Sourcing Standard. Objective 2 requires Program Participants to mandate the use and monitor the implementation of forestry BMP's that include proper waste disposal. Enviva's ENV-SFIS-01 Certified Sourcing Implementation Manual describes how Enviva's Tract Set up process and its harvest site inspection process fulfils the Objective.

Forestry BMP's are the best tool available to ensure forest management activities do not adversely impact forests and other areas of high conservation value. Enviva contractually requires the use of BMP's. Enviva's Tract Set up process includes a harvest site auditing component to ensure suppliers conform to the requirement. The Forestry Commissions for each state in the supply area monitor and enforce BMP implementation. Forestry BMP's for each state have a waste removal component.

Primary Feedstock

Enviva uses its proprietary Tract Set up process for all primary wood purchases. Specifically, Enviva maintains a robust tracking and monitoring program to ensure that all our suppliers deliver wood that is sourced according to our expectations. The information Enviva collects for every tract its suppliers harvest includes; data on the forest type, age, GPS coordinates, acreage, and the percent of volume from that tract being sold to Enviva. Before agreeing to accept material from a certain tract, Enviva's Procurement Foresters must obtain this tract-level data and enter it into our database, which generates a unique tract ID. Then, upon delivery to the mill, each load is linked to that tract's ID number. As a result, Enviva knows the tract-level attributes for all the primary wood entering the mill. Enviva conducts risk based field sampling audits and verifies feedstocks are not sourced from tracts without proper waste disposal. During annual certification audits an independent certifying body confirms Enviva's internal findings as part of its third-party audit assessment. And Enviva's Tract Set up process ensures forest management activities do not harm sensitive eco-systems, habitats or threaten biodiversity in its sourcing practices.

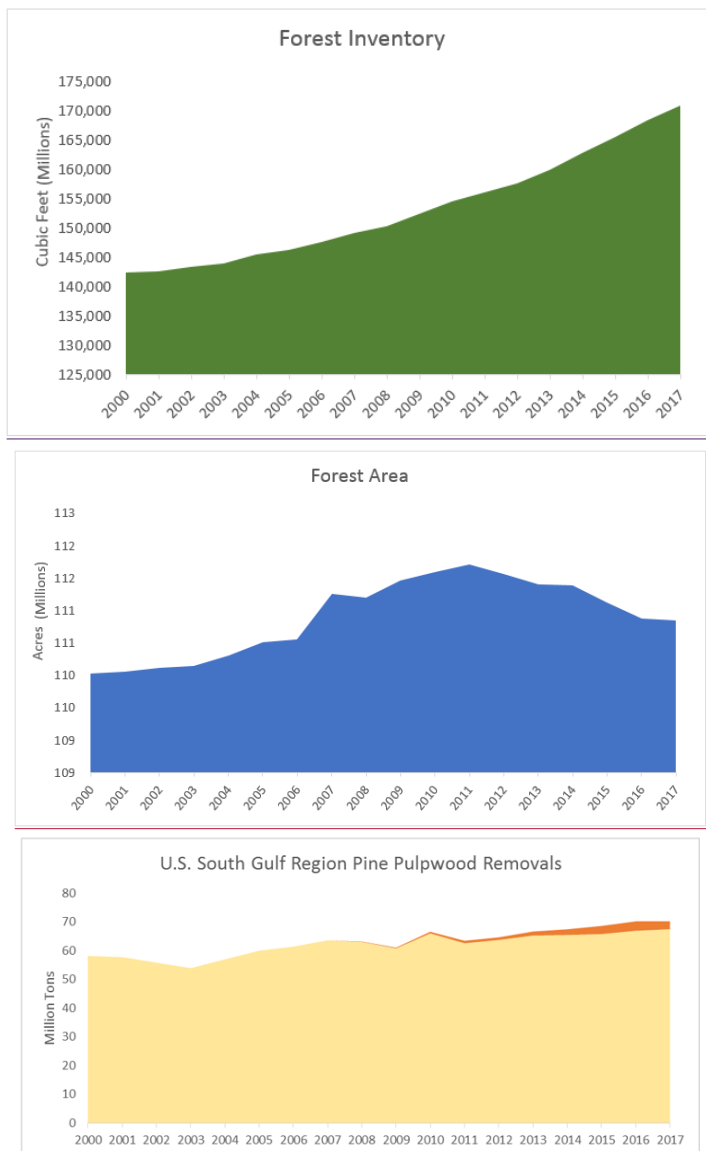
Secondary Feedstock

Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations Document. The process collects information about the suppliers sourcing area, species

	<p>processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses its Tract Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers.</p> <p><u>Conclusion</u></p> <p>There is a low risk the Enviva sourcing practices will harm forest due to waste disposal.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. ENV-SFIS-01 Certified Sourcing Implementation Manual c. Delivered Fiber Agreement d. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment e. Tract Set up process f. Supplier Audit Checklist Process g. Tract Set upProcess h. State BMP Manuals and monitoring data i. Word Bank Worldwide Governance Indicators
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.3.1	<p>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.</p>
Finding	<p>A 2015 Forest2Market report titled <i>Wood Supply Market Trends in the US South</i> concluded that in 2014, the total wood consumption for all markets in the south was only 3.3% of total forest inventory. Removals for pellet production represents 0.3% of all the US South standing inventory.</p> <p>The annual growth to drain ratio of the supply base is 1.23:1 for all species, 1.08:1 for hardwood, and 1.28:1 for pine. A positive growth to drain ratio indicates that forest growth exceeds harvest removals. In the Gulf region of the U.S. South, total inventory has increased by an average of 1.2% annually between 2000 and 2017. Since 2000, US Forest Service Forest Inventory Analysis (FIA) data indicates an increase in forest area in the states covered included in the Enviva supply base area.</p> <p>Enviva is just one of several industries and entities sourcing wood in its supply base area. Removals of both pine and hardwood for pellet production in the Southern region comprised only 2.7% of total harvest volume in 2017. Primary harvesting activity and wood consumption in the South is driven by saw-timber markets, with total removals for the pellet industry comprising only 0.1% of the total pine inventory and 0.08% of the total</p>

hardwood inventory. In 2017, pine pulpwood removals for the entire pellet industry accounted for 3.8% of total pine pulpwood removals for all wood product classifications



The procurement of wood material contributes to reducing environmental impacts and enhancing the productivity of forests. A 2017 Forest2Market report, *Historic Perspectives on the Relationship between Demand and Forest Productivity in the US South*, concluded further that a positive relationship exists between forest harvest and forest growth, proving that forest landowners respond to robust forest products markets by planting more trees. Markets for low valued wood products allow for more efficient site preparation and reforestation. 36% of Enviva's feedstock is sourced as processing residues from secondary sources which harvested wood is intended for saw timber-derived products.

Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure it Enviva is aware of forest impact assessments, planning implementation and monitoring efforts, forestry best management practices in all of Enviva's supply areas. The annual review requires an analysis of growth to drain in the supply area.

	<u>Conclusion</u> There is a low risk the Enviva sourcing practices will harm growth to drain levels in the supply area.
Means of Verification	a. Preamble citations b. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment c. USFS FIA web site d. Growth Drain study e. Forest2Market Reports <ul style="list-style-type: none"> https://www.forest2market.com/hubfs/2016_Website/Documents/20151119_Forest2Market_USSouthWoodSupplyTrends.pdf https://www.forest2market.com/hubfs/2016_Website/Documents/20170726_Forest2Market_Historical_Perspective_US_South.pdf?t=1516993507491
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.3.2	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Finding	<p>In the United States regulation of worker training and protection has its roots in federal law and acts and state laws and regulations. The United States has a robust legal system that deters the abuse of state and federal act, laws and regulation. The United States ranks in the top 92nd percentile in Regulatory Quality in the World Bank, Worldwide Governance Indicators and in the top 89th percentile in Rule of Law. Workforce laws in use in the United States follow OSHA guidance and include in-woods practices through manufacturing and transportation.</p> <p><u>Additional evidence</u> Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:</p> <ul style="list-style-type: none"> - Illegally harvest wood; - Wood harvested in violation of traditional and civil rights; - Wood harvested from forests where high conservation values are threatened by management activities; - Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use; - Wood from forests where genetically modified trees are planted; - Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work. <p>Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement. The Agreement require suppliers to ensure their supply chain follows all applicable laws including and ensure each crew is led by a properly trained foreman. Logger training can be verified via</p>

	<p>each state's logger training program website General information about logger training programs can be found, https://www.sfiopa.org/_download_link.php?did=32. Enviva annually reviews supplier training to ensure it is current.</p> <p>The SFI Fiber Sourcing Standard Objective 6 requires Program Participants to contractors, and personnel and appropriately trained to do their tasks and requires the use of qualified logging professionals. Enviva's ENV-SFIS-01 Certified Sourcing Implementation Manual describes the internal processes Enviva uses to ensure these requirements are met.</p> <p>SFI Logger Training Programs provide training in 13 management principles. Each state develops its own training modules to fulfil the training needs of the states logging force.</p> <ol style="list-style-type: none"> 1. Sustainable Forestry 2. Forest Productivity and Health 3. Protection of Water Resources 4. Protection of Biological Diversity 5. Aesthetics and Recreation 6. Protection of Special Sites 7. Responsible Fiber Sourcing in North America 8. Legal Compliance 9. Research 10. Training and Education 11. Community Involvement and Social Responsibility 12. Transparency 13. Continual Improvement <p>Specifics for each state program can be found</p> <ul style="list-style-type: none"> • Alabama – https://www.alaforestry.org/page/PLMGeneral • Florida – http://floridaforest.org/programs/master-logger/ • Georgia – http://gamth.org/ • South Carolina – https://www.scforestry.org/top <p>Enviva's internal Human Resources practices, Operational Excellence Management System and Safety Program ensure employees receive the proper training to perform their tasks safely. Enviva conducts in-depth internal training for all employees and those records are checked during third party audits.</p> <p>Enviva's staff with Sustainable Biomass Program responsibility all have college/university degrees in Forestry or a related field. Additional staff training may include:</p> <ul style="list-style-type: none"> • State level logger training to enhance understanding of state harvesting regulations and forestry BMP's • Training in the structure and requirements of Enviva's SFI Wood Sourcing, and FSC/PEFC/SFI Chain of Custody systems • Internal high conservation value area identification • Tract Set up process • Climate change • Community relations • Safety
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	<p>All on site contractors are vetted prior to signing work contracts including a review of their training and safety policies, OSHA 300 log, and other relevant records.</p> <p><u>Conclusion</u> Enviva sourcing practices ensures adequate training is provided by Enviva, its contractors and suppliers.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. ENV-SFIS-Certified Sourcing Implementation Manual c. Delivered Fiber Agreement d. Staff training documentation e. State logger training websites f. World Bank Worldwide Governance Indicators
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> 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	<p>The National Association of State Foresters website contains State-wide Assessments describing the contributions the timber industry has in each state contained in the Enviva supply base area. The forests of the Southeast provide a number of economic and societal benefits such as manufacturing, employment, recreation, aesthetics, and environmental protection. To ensure that the forests can meet the current and future economic, ecological, cultural, and recreational demands placed on them, State Foresters, Forest Managers and others must focus their efforts to address changing landowner objectives, parcelization and fragmentation, current and emerging markets, forest regulation, critical habitats, and cultural/recreational concerns.</p> <p>In addition to the 90 jobs created at the facility, Enviva has created 90 jobs at the Waycross facility as well as another market for wood fiber. This additional market only adds to a forest products industry that is a leading industry and employer in both GA and FL. According to recent economic studies, forestry is a \$18.5 billion industry in AL (2016), a \$25.05 billion industry in FL (2016), a \$21.3 billion industry in GA (2017), and a \$21.2 billion industry in SC (2018) annually.</p> <p><u>Conclusion</u> Evidence demonstrates the economic benefits of Enviva's presence in the supply area.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. National State Forester web site c. Internal Economic Impact Study
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.4.1	<p>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).</p>
Finding	<p>Forest landowners in the supply base area can participate in numerous federal funding opportunities to maintain forest health. One of the most successful programs is the Southern Pine Beetle Prevention Program. Since 2003, the program has allocated millions of dollars to improving the health of pine stands primarily through thinnings and understory management. Between 2003 and 2016, over 1 million acres of private and public lands were granted funding to help prevent against pine beetle infestations. (https://www.srs.fs.usda.gov/compass/2016/12/20/southern-pine-beetle-prevention-program/)</p> <p>In addition, the Forest Health Protection (FHP) program also provides federal aid for management for insect species such as the Gypsy moth, Southern pine beetle and Hemlock woolly-delgid, and many other native and invasive. (https://www.fs.fed.us/foresthealth/).</p> <p>The USFS also provides forest health monitoring that includes state level Forest Health Highlights for each state (https://www.fs.fed.us/foresthealth/protecting-forest/forest-health-monitoring/monitoring-forest-highlights.shtml). These reports describe state level efforts underway to protect and/or enhance forest health</p> <p>State level resources describing forest health protection efforts include.</p> <ul style="list-style-type: none"> Alabama – http://www.forestry.alabama.gov/Pages/Fire/Forest_Health.aspx Florida – https://www.fdacs.gov/Divisions-Offices/Florida-Forest-Service/Our-Forests/Forest-Health/Forest-Health-Fundamentals Georgia – https://gatrees.org/forest-management-conservation/forest-health/ South Carolina – http://www.trees.sc.gov/fra-pro.htm <p>The annual growth to drain ratio of the supply base is 1.23:1 for all species, 1.08:1 for hardwood, and 1.28:1 for pine. A positive growth to drain ratio indicates that forest growth exceeds harvest removals. In the Gulf region of the U.S. South, total inventory has increased by an average of 1.2% annually between 2000 and 2017. Since 2000, US Forest Service Forest Inventory Analysis (FIA) data indicates an increase in forest area in the states covered included in the Enviva supply base area.</p> <p>Enviva is also a member of the National Council on Air and Stream Improvement (NCASI). NCASI is a 501 (c) (6) tax-exempt association that serves the forest products industry as a center of excellence by providing unbiased, scientific research and technical information to help the wood products industry achieve environmental and sustainability goals. Membership allows Enviva to stay informed of trends in forest health and interact with other in the wood products industry to develop useful research for the forest products sector NCASI Technical Bulletin No. 1022 <i>Summary of Conservation Planning Efforts in Forested Regions of the United States: 2014 Update</i> describes conservation plans and initiatives states are undertaking to ensure forest health. The bulletin contains information on 19 national conservation planning initiatives, 9 regional conservation planning initiatives,</p> <p><u>Additional evidence</u></p>

The SFI Fiber Sourcing Program Objective 5 requires Program Participants to individually or with others participate in research related to forest health issues. Enviva's ENV-SFIS-01 Certified Sourcing Implementation Manual describes the internal processes Enviva uses to meet the requirement. Markets for residual by-products benefit sawmills which in turn benefits forest landowners and helps support reforestation.

ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment and this supply base evaluation are reviewed annually to ensure it Enviva is aware of state forest impact assessments, planning implementation and monitoring efforts, forestry best management practices in all of Enviva's supply areas. The annual review requires a review of evidence to ensure harvesting practices do not harm forest health or vitality. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement.

Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:

- Illegally harvest wood;
- Wood harvested in violation of traditional and civil rights;
- Wood harvested from forests where high conservation values are threatened by management activities;
- Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use;
- Wood from forests where genetically modified trees are planted;
- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.

Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement. The Agreement requires the use of forestry BMP's that are the best tool available to ensure forest management activities do not adversely impact forest health and vitality. Even in areas not associated with streams or water features, forestry BMP's specify how roads, trails and other forest management activities are performed to minimize their impact on the forest.

Primary Feedstock

Enviva uses its proprietary Tract Set up process for all primary wood purchases. Specifically, Enviva maintains a robust tracking and monitoring program to ensure that all our suppliers deliver wood that is sourced according to our expectations. The information Enviva collects for every tract its suppliers harvest includes; data on the forest type, age, GPS coordinates, acreage, and the percent of volume from that tract being sold to Enviva. Before agreeing to accept material from a certain tract, Enviva's Procurement Foresters must obtain this tract-level data and enter it into our database, which generates a unique tract ID. Then, upon delivery to the mill, each load is linked to that tract's ID number. As a result, Enviva knows the tract-level attributes for all the primary wood entering the mill. Enviva conducts risk based field sampling audits that reviews the reforestation success and health of forest tracts. During annual certification audits an independent certifying body confirms Enviva's internal findings as part of its third-party audit assessment. And

	<p>Enviva's Tract Set up process ensures forest management activities do not harm sensitive eco-systems, habitats or threaten biodiversity in its sourcing practices.</p> <p><i>Secondary Feedstock</i></p> <p>Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations Document. The process collects information about the suppliers sourcing area, species processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses its Tract Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers.</p> <p><u>Conclusion</u></p> <p>According to SBP Guidance Document: Assessment of Risk, Means of Verification and Mitigation Measures in the Southeast US, "SBP has yet to receive a Regional Risk Assessment (RRA) for the US to evaluate for approval and considers all of the currently available assessment resources in and of themselves to be only partially adequate in assessing whether forest health and vitality and other forest services are conserved." Use of the FSC CWNRA is suggested but is considered incomplete in determining if forest health, vitality and other services provided by forest ecosystems are maintained or improved.</p> <p>Enviva engages with willing stakeholders to continually assess for improvements in health, vitality and other forest services (https://www.greenbiz.com/article/stakeholder-engagement-how-enviva-moved-crisis-collaboration). We find these engagements and subsequent collaborations to be both enlightening and beneficial in the promotion of sustainable forest management.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. ENV-COC-03 Controlled Sources Risk Assessment c. ENV-SFIS-01 Certified Sourcing Implementation Manual d. Delivered Fiber Agreement e. Tract Set up process f. Supplier Audit Checklist Process g. Tract Set upProcess h. NCASI Technical Bulletin No 982 & No. 1022 Summary of Conservation Planning Efforts in Forested Regions of the United States: 2014 Update
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p><u>Management System</u></p> <p>Enviva will annually review it's Means of Verification, engage with Stakeholders, use its Tract Set upProcess and Supplier Audit Checklist Process to develop meaningful way to assess forest health, vitality and ecosystem services are maintained or improved.</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.4.2	<p>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).</p>
Finding	<p>The USFS also provides forest health monitoring that includes state level Forest Health Highlights for each state (https://www.fs.fed.us/foresthealth/protecting-forest/forest-health-monitoring/monitoring-forest-highlights.shtml). These reports describe state level efforts underway to protect and/or enhance forest health</p> <p>State level resources describing forest health protection efforts include.</p> <ul style="list-style-type: none"> • Alabama – http://www.forestry.alabama.gov/Pages/Fire/Forest_Health.aspx • Florida – https://www.fdacs.gov/Divisions-Offices/Florida-Forest-Service/Our-Forests/Forest-Health/Forest-Health-Fundamentals • Georgia – https://gatrees.org/forest-management-conservation/forest-health/ • South Carolina – http://www.trees.sc.gov/fra-pro.htm <p>Enviva is also a member of the National Council on Air and Stream Improvement (NCASI). NCASI is a 501 (c) (6) tax-exempt association that serves the forest products industry as a center of excellence by providing unbiased, scientific research and technical information to help the wood products industry achieve environmental and sustainability goals. Membership allows Enviva to stay informed of trends in forest health and interact with other in the wood products industry to develop useful research for the forest products sector NCASI Technical Bulletin No. 1022 <i>Summary of Conservation Planning Efforts in Forested Regions of the United States: 2014 Update</i> describes conservation plans and initiatives states are undertaking to ensure forest health. The bulletin contains information on 19 national conservation planning initiatives, 9 regional conservation planning initiatives,</p> <p>Forest management use of herbicides and pesticides to control unwanted vegetation and insect. State specific herbicide BMP websites are listed below.</p> <ul style="list-style-type: none"> • Alabama – http://www.forestry.alabama.gov/Pages/Management/Forms/2007_BMP_Manual.pdf • Florida – https://www.fdacs.gov/Forest-Wildfire/Silviculture-Best-Management-Practices • Georgia – https://gatrees.org/forest-management-conservation/water-quality-protection/ • South Carolina – https://www.state.sc.us/forest/bmpmanual.pdf <p>Though each state has varying guidance for herbicide and pesticide use all use of these chemicals is regulated by the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). FIFRA is a federal statute that governs the registration, distribution, sale, and use of pesticides in the United States. With certain exceptions, a pesticide is any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, or intended for use as a plant regulator, defoliant, or desiccant, or desiccant, or any nitrogen stabilizer.</p>

	<p>Examples of enforcement of Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) can be found on the United States Environmental Protection Agency website (https://cfpub.epa.gov/compliance/criminal_prosecution/).</p> <p>Information about Integrated Pest Management can be found on the USDA Forest Service website (https://www.fs.fed.us/foresthealth/protecting-forest/integrated-pest-management/).</p> <p>Forest management activities related to prescribe fire site preparation techniques. State specific prescribed fire regulation websites are listed below.</p> <ul style="list-style-type: none"> • Alabama – http://www.forestry.alabama.gov/Pages/Informational/Legal/Prescribed_Burn_Act.aspx • Florida – https://www.fdacs.gov/Forest-Wildfire/Wildland-Fire/Prescribed-Fire • Georgia – https://gatrees.org/fire-prevention-suppression/prescribed-burn-certification/ • South Carolina – https://www.state.sc.us/forest/fire.htm <p>Examples of enforcement of forestry fire laws can be found on the United States Fire Administration website (https://www.usfa.fema.gov/prevention/outreach/wildfire_arson/court_cases.html).</p> <p>The US Environmental Protection Agency website containing information about enforcement activities can be found at (https://cfpub.epa.gov/compliance/criminal_prosecution/).</p> <p>In some cases, Enviva can help landowners control infestations by providing a market for diseased, damaged or infested wood which allow landowners to replant healthy forests. In 2018 the Florida Forest Service determined Hurricane Michael damaged over 2.8 million acres of forestland (http://floridaforest.org/wp-content/uploads/Hurricane-Michael-Initial-Timber-Damage-Estimate.pdf). Enviva joined with other sponsors to hold a landowner workshop to help affected landowners get sound advice to plan their reforestation recovery efforts (http://sfrc.ufl.edu/extension/florida_forestry_information/events_calendar/files/Hurricane_Recovery_Blountstown19_Booklet.pdf).</p> <p>Enviva reviews sources such as the National Association of State Foresters, USFS Forest Inventory Analysis, World Wildlife Fund, Conservation International and World Resources Institute to conduct a state by state study of its supply area. The analysis indicates there are ample state and regional forest assessment tools that help determine forestry regulations within the supply base area. The analysis determined the wood products industry is well established, logger training is an industry norm and the use of forestry best management practices are a long-standing business practice in the supply base area.</p> <p>In the United States regulation of forestry practices has its roots in federal law and acts designed to provide minimum guidance to states in developing state specific laws and regulations and ranks in the top 92nd percentile in Regulatory Quality in the World Bank, Worldwide Governance Indicators and in the top 89th percentile in Rule of Law. Chemical use in forest management activities also follow EPA guidance under FIFRA and include in-woods practices. A review of the EPA Civil Cases and Settlements by Statute resulted in no findings related to forest management activities. The United States has a robust legal system that deters the abuse of state and federal regulation</p>
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Additional evidence

Each state within the Enviva supply base has a state forest action plan in place that is designed to guide the work of forestry professionals to help manage, protect, enhance, and conserve forest resources within the state. These plans address forest pest, disease, and wildfire to ensure healthy forest and are available on the National State Forester Website.

ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure it Enviva is aware of state forest impact assessments, planning implementation and monitoring efforts, forestry best management practices in all of Enviva's supply areas. The annual review requires a review of evidence to ensure harvesting practices do not harm forest health or vitality. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement.

Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:

- Illegally harvest wood;
- Wood harvested in violation of traditional and civil rights;
- Wood harvested from forests where high conservation values are threatened by management activities;
- Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use;
- Wood from forests where genetically modified trees are planted;
- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.

Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement. The Agreement requires the use of forestry BMP's that are the best tool available to ensure forest management activities do not adversely impact forest health and vitality.

Primary Feedstock

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Secondary Feedstock

	<p>Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations Document. The process collects information about the suppliers sourcing area, species processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses its Tract Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers.</p> <p><u>Conclusion</u> Enviva sourcing practices verify natural processes are appropriately managed.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. USDA Forest Service web site c. National State Foresters web site State Forest Action Plans d. Florida Forest Service e. World Bank Worldwide Governance Indicators f. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment g. Delivered Fiber Agreement h. Tract Set up process i. Supplier Audit Checklist Process j. Tract Set upProcess
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> 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 unauthorized activities, such as illegal logging, mining and encroachment (CPETS7c).
Finding	<p>FSC US CWNRA Controlled Wood Category 1 Illegally Harvested Wood is well documented and provides clear evidence that illegal logging in the US is a low risk. SBP Principle 1 Biomass feedstock is legally sourced covers this indicator as well.</p> <p>In the United States regulation of forestry practices has its roots in Federal law and in Acts designed to provide guidance to states for developing state specific laws and regulations. The US ranks in the top 92nd percentile in Regulatory Quality in the World Bank, Worldwide Governance Indicators and in the top 89th percentile in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and this reporting reveals no widespread or systematic criminal activity in the Enviva supply base area.</p> <p><u>Additional evidence</u> Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:</p>

- Illegally harvest wood;
- Wood harvested in violation of traditional and civil rights;
- Wood harvested from forests where high conservation values are threatened by management activities;
- Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use;
- Wood from forests where genetically modified trees are planted;
- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.

Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.

Primary Feedstock

Enviva uses its proprietary Tract Set up process for all primary wood purchases. Specifically, Enviva maintains a robust tracking and monitoring program to ensure that all our suppliers deliver wood that is sourced according to our expectations. The information Enviva collects for every tract its suppliers harvest includes; data on the forest type, age, GPS coordinates, acreage, and the percent of volume from that tract being sold to Enviva. Before agreeing to accept material from a certain tract, Enviva's Procurement Foresters must obtain this tract-level data and enter it into our database, which generates a unique tract ID. Then, upon delivery to the mill, each load is linked to that tract's ID number. As a result, Enviva knows the tract-level attributes for all the primary wood entering the mill. Enviva conducts risk based field sampling audits and verifies feedstocks are not from illegal mining or encroachment activities. During annual certification audits an independent certifying body confirms Enviva's internal findings as part of its third-party audit assessment.

Secondary Feedstock

Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations Document. The process collects information about the suppliers sourcing area, species processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses its Tract Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers.

ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if illegal mining or encroachment are prevalent in the supply base area. This document uses many of the same sources as the FSC US CWNRA. Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure Enviva is aware of changes in the supply base area. The review concluded the same as the FSC US CWNRA that there is a low risk of illegal logging activity in the US. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source

	<p>Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement.</p> <p><u>Conclusion</u></p> <p>Laws and regulations are enforced in the United States and Enviva's supply area to ensure the potential for illegal logging, mining or other encroachment is a low risk.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. FSC US CWNRA c. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment d. Delivered Fiber Agreement e. Tract Set up process f. Supplier Audit Checklist Process g. World Bank Worldwide Governance Indicators
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.5.1	<p>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).</p>
Finding	<p>FSC US CWNRA findings relevant to this indicator:</p> <p>2.1. The forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control. – The forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control.</p> <p>2.3. The rights of Indigenous and Traditional Peoples are upheld. – The rights of indigenous and traditional peoples are upheld, particularly in the forest sector.</p> <p>US ranks in the top 92nd percentile in Regulatory Quality in the World Bank, Worldwide Governance Indicators and in the top 89th percentile in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic criminal activity related to the violation of customary or traditional tenure and use rights of indigenous people groups in the Enviva supply base area.</p> <p>The US is an industrial nation that does not have people groups dependent on a particular site or resource for basic human need. Further, federal and State legislation governs Native Americans and their rights are strictly enforced. Because Enviva and its supplier's source from primarily private forestlands where there are no issues related to traditional use or tenure rights. When Enviva does source from public lands, those forest managers are required to follow state or federal requirements to ensure harvests maintain the forest to the good of the public, including working with Native Americans. Native American reservations do exist within the Enviva supply base, but all are either under tribal or federal ownership. Enviva also has a formal process for receiving and responding to public inquiries, particularly those that potentially relate to practices that appear to be inconsistent with existing certification requirements.</p>

Additional evidence

Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:

- Illegally harvest wood;
- Wood harvested in violation of traditional and civil rights;
- Wood harvested from forests where high conservation values are threatened by management activities;
- Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use;
- Wood from forests where genetically modified trees are planted;
- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.

Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.

ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if its sourcing activities would pose a threat to legal, customary or traditional land use rights in the supply area. This document uses many of the same sources as the FSC US CWNRA. Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure Enviva is aware of changes in the supply base area. The review came to the same determination as the FSC US CWNRA meaning there is a low risk Enviva's sourcing practices would threaten these people groups or their rights. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement.

Primary Feedstock

Enviva uses its proprietary Tract Set up process for all primary wood purchases. Specifically, Enviva maintains a robust tracking and monitoring program to ensure that all our suppliers deliver wood that is sourced according to our expectations. The information Enviva collects for every tract its suppliers harvest includes; data on the forest type, age, GPS coordinates, acreage, and the percent of volume from that tract being sold to Enviva. Before agreeing to accept material from a certain tract, Enviva's Procurement Foresters must obtain this tract-level data and enter it into our database, which generates a unique tract ID. Then, upon delivery to the mill, each load is linked to that tract's ID number. As a result, Enviva knows the tract-level attributes for all the primary wood entering the mill. Enviva conducts risk based field sampling audits and can assess whether sourcing activities threaten indigenous peoples or local communities forest access rights. During annual certification audits an independent certifying body confirms Enviva's internal findings as part of its third-party audit assessment.

Secondary Feedstock

Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations Document. The process collects information about the suppliers sourcing area, species processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the

	<p>Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses its Tract Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers.</p> <p><u>Conclusion</u></p> <p>There are adequate law and regulation in the United States and Enviva's supply area to ensure there are no threats to traditional or customary land use rights.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. FSC US CWNRA c. Federal and State laws and statutes d. Tract Set up process e. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment f. Supplier Audit Checklist Process g. Delivered Fiber Agreement h. World Bank Worldwide Governance Indicators
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.5.2	<p>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.</p>
Finding	<p>Excerpt from the FSC US CWNRA</p> <p>"The United States is an industrialized nation that likely does not contain non-tribal communities within the conterminous states that directly rely on sites or resources fundamental to satisfying basic needs.</p> <p>No evidence of HCV 5 related to non-tribal communities in the conterminous United States was found through a literature search on this topic. There is some evidence that they may occur in Alaska and Hawaii [160, 161], but these states are not included in the assessment area for the NRA. FSC US also surveyed US certification bodies with forest management clients to inquire if they have received any comments from communities or stakeholders that depend on forests for their livelihood during forest management public consultations – the response was negative from all surveyed certification bodies [159]. There is no reason to believe that HCV 5 would be more or less likely to occur on certified vs noncertified lands (the focus of the NRA), therefore, our survey of certification bodies provides a sampling of lands throughout the assessment area. FSC US staff consulted with two FSC-certified tribes, two forest managers with extensive experience working with Tribes, and a representative of an affiliation of tribes." There are no subsistence communities sourcing basic needs from the forest in the Enviva supply area.</p>

US ranks in the top 92nd percentile in Regulatory Quality in the World Bank, Worldwide Governance Indicators and in the top 89th percentile in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic criminal activity to suggest forest activities are threatening water supplies or subsistence means of communities in the Enviva supply base area.

Additional evidence

Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:

- Illegally harvest wood;
- Wood harvested in violation of traditional and civil rights;
- Wood harvested from forests where high conservation values are threatened by management activities;
- Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use;
- Wood from forests where genetically modified trees are planted;
- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.

Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.

ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if there are subsistence communities in the supply base area. This document uses many of the same sources as the FSC US CWNRA. As did the FSC US CWNRA, the review determined there are no subsistence communities in the supply base area. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement.

Primary Feedstock

Enviva uses its proprietary Tract Set up process for all primary wood purchases. Specifically, Enviva maintains a robust tracking and monitoring program to ensure that all our suppliers deliver wood that is sourced according to our expectations. The information Enviva collects for every tract its suppliers harvest includes; data on the forest type, age, GPS coordinates, acreage, and the percent of volume from that tract being sold to Enviva. Before agreeing to accept material from a certain tract, Enviva's Procurement Foresters must obtain this tract-level data and enter it into our database, which generates a unique tract ID. Then, upon delivery to the mill, each load is linked to that tract's ID number. As a result, Enviva knows the tract-level attributes for all the primary wood entering the mill. Enviva conducts risk based field sampling audits and can assess whether sourcing activities threaten subsistence communities. During annual certification audits an independent certifying body confirms Enviva's internal findings as part of its third-party audit assessment.

Secondary Feedstock

Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations Document. The process collects information about the suppliers sourcing area, species

	<p>processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses its Tract Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers.</p> <p><u>Conclusion</u></p> <p>There is a low risk Enviva's sourcing practices will impact a community relying on the forest for its subsistence.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. FSC US CWNRA c. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment d. Tract Set up process e. Supplier Audit Checklist Process f. Delivered Fiber Agreement g. World Bank Worldwide Governance Indicators
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.6.1	<p>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.</p>
Finding	<p>Some FSC US CWNRA findings related to this indicator</p> <p>1.1 Land tenure and management rights finds the US legality of ownership to be a low risk citing landownership records in the US are highly reliable and frequently used by banking institutions to issue mortgages generally requiring title clearances.</p> <p>“In its report to the Montreal Process Working Group on the Conservation and Management of Temperate and Boreal Forests, in scoring an indicator relating to land tenure, the US government concluded that, “All forest land owners, public and private, exercise their forest tenure rights to achieve their forest land management goals”</p> <p>2.2. Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work. - Labor rights are upheld including rights as specified in ILO Fundamental Principles and Rights at Work, particularly in the forest sector.</p> <p>Federal Law regarding forestry dictate that: Forest fire fighting and forest fire prevention occupations, timber tract occupations, forestry service occupations, logging occupations, and occupations in the operation of any sawmill, lathe mill, shingle mill, or cooperage stock mill abide by (Order 4). [75 FR 28453, May 20, 2010]</p>

	<p>OSHA work rules ensure workers have a right to a safe workplace. The law requires employers to provide their employees with working conditions that are free of known dangers. The OSHA law also prohibits employers from retaliating against employees for exercising their rights under the law (including the right to raise a health and safety concern or report an injury). For more information see www.whistleblowers.gov or worker rights.</p> <p>US ranks in the top 92nd percentile in Regulatory Quality in the World Bank, Worldwide Governance Indicators and in the top 89th percentile in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic criminal activity related to the suppression of lawsuits in the grievance process of forest related activities in the Enviva supply base area.</p> <p><u>Additional evidence</u></p> <p>Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:</p> <ul style="list-style-type: none"> - Illegally harvest wood; - Wood harvested in violation of traditional and civil rights; - Wood harvested from forests where high conservation values are threatened by management activities; - Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use; - Wood from forests where genetically modified trees are planted; - Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work. <p>Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.</p> <p>ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if there are adequate laws and enforcement to permit resolution to valid complaints. This document uses many of the same sources as the FSC US CWNRA. The FSC US CWNRA and Enviva's analysis both arrived at the same conclusion, there are appropriate mechanisms and a low risk of violations. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement.</p> <p>The PEFC Chain of Custody Standard requires the certificate holder to have and maintain a complaints process. ENV-PEFCCOC-01 PEFC Chain of Custody is the Enviva document describing the internal process for handling complaints.</p> <p><u>Conclusion</u></p> <p>Enviva's sourcing practices confirms the existence and enforcement of appropriate laws and regulations governing grievances, disputes, tenure and use rights.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. State and federal laws c. Occupational Health and Safety Administration d. FSC US CWNRA e. ENV-PEFCCOC-01 PEFC Chain of Custody

	f. Delivered Fiber Agreement g. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment h. ENV-PEFCCOC-01 PEFC Chain of Custody Procedure i. World Bank Worldwide Governance Indicators
Evidence Reviewed	
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.7.1	<p>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.</p>
Finding	<p>The FSC US CWNRA determined: 2.2. Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work.</p> <p><i>“Freedom of Association & Collective Bargaining</i> Even though the US has not ratified either of the associated Core Conventions, it has been a member of the ILO since 1980 (and previous to that was a member from 1934 to 1977). As a member, the US has obligations under the ILO Constitution, including a commitment under the Declaration on Fundamental Principles and Rights at Work. Additionally, the US is subject to annual ILO review and reporting processes and also complaint processes (through the Committee on Freedom of Association, CFA). A report by the International Organisation of Employers (IOE) notes that “Most CFA case examinations of U.S. law have resulted in conclusions and recommendations that the law or practice subject of the complaint is consistent with the principles of freedom of association” and that “there has never been a wholesale criticism of the NLRA or NLRB by the CFA or the ILO”. There are 42 closed complaints cases listed in the US member profile. All of this provides strong evidence that the United States respects, promotes and realizes, in good faith, workers’ rights to “freedom of association and the effective recognition of the right to collective bargaining.”</p> <p>Additionally, FSC determined, “It is possible to conclude from the information presented that while the US has not ratified and may not conform with all specifics in the associated Core Conventions, it respects the fundamental rights of freedom of association and the effective recognition of the right to collective bargaining.”</p> <p>US ranks in the top 92nd percentile in Regulatory Quality in the World Bank Worldwide Governance Indicators and in the top 89th percentile in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic criminal activity violating the freedom of association or collective bargaining in the Enviva supply base area.</p> <p>U.S. law clearly specifies rights to collective bargaining and freedom of association. Enviva’s HR practices ensure worker rights are protected. All contracts contain verbiage requiring suppliers to conform to all applicable laws. The United States ratified ILO C150 – Labor Administration Convention securing the rights of worker organization and collective bargaining. Verification of this and other ILO US Ratified Conventions can be found on the ILO NORMLEX website</p> <p>Enviva posts all of the US required employee information posters in key locations for all employees to see and read. Enviva’s employee handbook describes the rights each worker enjoys including the right of free association and collective bargaining.</p>

	<p>The United States Department of Labor provides verification of enforcement. (https://www.dol.gov/general/aboutdol/majorlaws)</p> <p><u>Additional evidence</u></p> <p>Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:</p> <ul style="list-style-type: none"> - Illegally harvest wood; - Wood harvested in violation of traditional and civil rights; - Wood harvested from forests where high conservation values are threatened by management activities; - Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use; - Wood from forests where genetically modified trees are planted; - Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work. <p>Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.</p> <p>ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if collective bargaining rights exist and are enforced in the supply area. This document uses many of the same sources as the FSC US CWNRA. Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure Enviva is aware of changes in the supply base area. As with the FSC US CWNRA the review determine laws and enforcement does exist in the supply base area. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement.</p> <p><u>Conclusion</u></p> <p>Analysis of Enviva's sourcing practices confirms the existence of appropriate laws and regulations governing workers right to associate.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. FSC US CWNRA c. Enviva HR policies and procedures d. ENV-COC-03 Controlled Wood Risk Assessment e. Enviva Employee Handbook f. Mill site employee postings g. Delivered Fiber Agreement h. ILO US Ratified Conventions i. ILO NORMLEX Information System j. United States Department of Labor k. World Bank Worldwide Governance Indicators
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> 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	<p>The FSC US CWNRA finds:</p> <p>2.2. Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work.</p> <p><u>“Compulsory or Forced Labor</u> The US ratified Core Convention 105 (Abolition of Forced Labour Convention) in 1991 and the ILO web site indicates the status as ‘In Force’. The US has not yet ratified Convention 29 (Forced Labour Convention), but as noted above has legislation that addresses fundamental rights associated with compulsory or forced labor. There are also numerous additional policies, reports, action plans and executive orders that provide evidence of the country’s efforts to ensure these rights, particularly as they relate to human trafficking [28].</p> <p>The United States is consistently categorized as Tier 1 (the highest tier reflecting a country’s efforts to address human trafficking problems) in the U.S. Department of State’s Trafficking in Persons annual report. The Global Slavery Index’s 2016 assessment identifies the United States as a country with one of the lowest estimated prevalence of modern slavery and as a country with one of the strongest responses to modern slavery. While the US has not ratified both relevant Core Conventions, it is still possible to conclude that the US respects the fundamental right to the elimination of all forms of forced or compulsory labor, and in particular that there are no concerns identified in the forest sector.”</p> <p>The U.S. supply areas where Enviva procures wood material have comprehensive laws prohibiting the use of compulsory labor or violating citizen’s rights. Enviva’s HR practices ensure worker rights are protected and employment is “at will”.</p> <p>The United States Department of Labor provides verification of enforcement. (https://www.dol.gov/general/aboutdol/majorlaws)</p> <p>US ranks in the top 92nd percentile in Regulatory Quality in the World Bank Worldwide Governance Indicators and in the top 89th percentile in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic criminal activity related to the use of compulsory labor in the wood products industry in the Enviva supply base area.</p> <p><u>Additional evidence</u> Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:</p> <ul style="list-style-type: none"> - Illegally harvest wood; - Wood harvested in violation of traditional and civil rights; - Wood harvested from forests where high conservation values are threatened by management activities;

	<ul style="list-style-type: none"> - Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use; - Wood from forests where genetically modified trees are planted; - Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work. <p>Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.</p> <p>ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if compulsory labor exists in the supply area. This document uses many of the same sources as the FSC US CWNRA. Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure Enviva is aware of changes in the supply base area. As with the FSC US CWNRA the review determines laws and enforcement does exist to prevent compulsory labor in the supply base area. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement.</p> <p><u>Conclusion</u></p> <p>Analysis of Enviva's sourcing practices confirms the existence of appropriate laws and regulations prohibiting compulsory labor.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. Federal and State web sites c. FSC US CWNRA d. Enviva HR policies and procedures e. ENV-COC-03 Controlled Wood Risk Assessment f. Delivered Fiber Agreement g. ILO US Ratified Conventions h. United States Code i. United States Department of Labor j. World Bank Worldwide Governance Indicators
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> 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	<p>The FSC CWNRA finds</p> <p>The United States ratified Core Convention 182 (Worst Forms of Child Labor Convention) in 1999 and the ILO web site indicates the status as 'In Force'. The US has not yet ratified Convention 138 (Minimum Age Convention), but as noted above has legislation that addresses fundamental rights associated with child labor. Additionally, every state has</p>

legislation that further limits the hours and days per week that minors may work in non-farm employment and 34 states have similar limits for farm work. And all states have compulsory education until at least 16 years of age [28]. The US Annual Reports to the ILO also detail statistics on the effective enforcement of the federal legislation, including hundreds of cases, thousands of children affected and millions of dollars paid in fines each year. The United States does not feature in the ILO Child Labour Country Dashboard, which indicates a low risk for child labour in the United States. The 2016 List of Goods Produced by Child Labor or Forced Labor [46] does not associate any goods produced in the US with child labor.”

Further it finds:

“While the US has not ratified both relevant Core Conventions, it is still possible to conclude that the US respects the fundamental right to the effective abolition of child labor, particularly in the forest sector.”

The United States Department of Labor provides verification of enforcement.
(<https://www.dol.gov/general/topic/youthlabor/enforcement>)

The U.S. supply areas where Enviva procures wood material have comprehensive laws prohibiting the use of child labor or violating citizen’s rights. Enviva’s HR practices ensure the company complies with minimum worker age requirements and all supplier contracts contain verbiage requiring suppliers to conform to all applicable laws.

From the AHEC Legality Study:

“We come to the conclusion that wood procured in the study area can be considered Low Risk of violating traditional and civil rights. This conclusion is based on the determination that there is no UN Security Council ban, there is no evidence of prolific child labor, there is no evidence that ILO Fundamental Principles are not respected, and there are recognized and equitable processes in place to resolve conflicts of substantial magnitude.”

“Forest employment in the US is regulated under federal and state laws and codes, which prohibit child labor and are consistent with the ILO Fundamental Principles and Rights at work.”

US ranks in the top 92nd percentile in Regulatory Quality in the World Bank, Worldwide Governance Indicators and in the top 89th percentile in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic criminal activity in the use of child labor in the Enviva supply base area.

Additional evidence

Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:

- Illegally harvest wood;
- Wood harvested in violation of traditional and civil rights;
- Wood harvested from forests where high conservation values are threatened by management activities;
- Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use;
- Wood from forests where genetically modified trees are planted;

	<p>- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.</p> <p>Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.</p> <p>ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if child labor exists the supply area. This document uses many if the same sources as the FSC US CWNRA. Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure Enviva is aware of changes in the supply base area. As with the FSC US CWNRA the review determine laws and enforcement does exist to prevent child labor in the supply base area. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement.</p> <p>Enviva does not employ anyone under the age or 18 years.</p> <p><u>Conclusion</u> Analysis of Enviva's sourcing practices confirms the existence of appropriate laws and regulations prohibiting child labor.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. Federal and State web sites c. FSC US CWNRA d. Enviva HR policies and procedures e. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment f. Delivered Fiber Agreement g. ILO US Ratified Conventions h. United States Department of Labor i. World Bank Worldwide Governance Indicators
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> 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	<p>The FSC US CWNRA finds:</p> <p>1.12 Legal employment – Most employment in the US is considered "at will," and can be terminated by either party or changed without prior notice. A written contract is not necessary; all employers are still subject to labor laws.</p> <p>2.2 Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work.</p>

"Discrimination with respect to employment is prohibited in the United States by Section VII of the Civil Rights Act of 1964 (Public Law 88-352), and is overseen by the U.S. Equal Employment Opportunity Commission. There are several additional and complementary pieces of legislation, such as: the Equal Pay Act of 1963 (EPA), which protects men and women who perform substantially equal work in the same establishment from sex-based wage discrimination; the Age Discrimination in Employment Act of 1967 (ADEA), which protects individuals who are 40 years of age or older; Title I and Title V of the Americans with Disabilities Act of 1990, as amended (ADA), which prohibit employment discrimination against qualified individuals with disabilities in the private sector, and in state and local governments; Sections 501 and 505 of the Rehabilitation Act of 1973, which prohibit discrimination against qualified individuals with disabilities who work in the federal government;"

"All indicators In the Category 1 (legality) assessment were designated as 'low risk' at a national scale, indicating that the relevant legislation is enforced."

In the United States regulation of forestry practices has its roots in federal law and acts designed to provide minimum guidance to states in developing state specific laws and regulations and ranks in the top 92nd percentile in Regulatory Quality in the World Bank, Worldwide Governance Indicators and in the top 89th percentile in Rule of Law.

The U.S. supply areas where Enviva procures wood material have comprehensive laws prohibiting the violation of citizen's rights. Enviva's HR practices ensure the company is an equal opportunity employer and prohibit discrimination in all of the federal and state laws in our areas of operation. Enviva's PEFC Due Diligence Risk Assessment was verified to show "There is no evidence of child labor or violation of ILO Fundamental Principles and Rights at work taking place in forest areas in the district concerned."

The United States Department of Labor provides verification of enforcement.
(<https://www.dol.gov/general/aboutdol/majorlaws>)

Additional evidence

Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:

- Illegally harvest wood;
- Wood harvested in violation of traditional and civil rights;
- Wood harvested from forests where high conservation values are threatened by management activities;
- Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use;
- Wood from forests where genetically modified trees are planted;
- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.

Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.

	<p>ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if labor discrimination exists the supply area. This document uses many if the same sources as the FSC US CWNRA. Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure Enviva is aware of changes in the supply base area. As with the FSC US CWNRA the review determine laws and enforcement does exist to prevent labor discrimination in the supply base area. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement.</p> <p><u>Conclusion</u> Analysis of Enviva's sourcing practices confirms the existence of appropriate laws and regulations prohibiting discrimination in the workplace.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. Federal and State web sites c. FSC US CWNRA d. Enviva HR policies and procedures e. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment f. Delivered Fiber Agreement g. ILO US Ratified Conventions h. United States Department of Labor i. Word Bank Worldwide Governance Indicators
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> 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	<p>The FSC US CWNRA finds:</p> <p>1.12 Legal employment – There is a large body of laws governing fair labor, worker safety and health. These laws protect forest workers by prescribing specific safety measures to employ and safety equipment to use while working. There is a low risk forest worker are not adequately protected.</p> <p>In the United States federal law and acts designed to provide minimum guidance to states in developing state specific laws and regulations. The nation ranks in the top 92nd percentile in Regulatory Quality in the World Bank Worldwide Governance Indicators and in the top 89th percentile in Rule of Law.</p> <p>The U.S. supply areas where Enviva procures wood material have comprehensive laws prohibiting the violation of worker's rights and establishing minimum wage requirements.</p> <p>Enviva's HR practices ensure worker wages are comparable to other similar employment opportunities in the regions we operate</p> <p>OSHA work rules ensure workers have a right to a safe workplace. The law requires employers to provide their employees with working conditions that are free of known dangers. The OSHA law also prohibits employers from retaliating against employees for</p>

	<p>exercising their rights under the law (including the right to raise a health and safety concern or report an injury). For more information see www.whistleblowers.gov or worker rights.</p> <p>The United States Department of Labor provides verification of enforcement. (https://www.dol.gov/general/aboutdol/majorlaws)</p> <p>The United State Department of Labor Occupational Safety and Health Administration provides verification of enforcement. (https://www.osha.gov/dep/index.html)</p> <p><u>Additional evidence</u></p> <p>Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance.</p> <p>Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:</p> <ul style="list-style-type: none"> - Illegally harvest wood; - Wood harvested in violation of traditional and civil rights; - Wood harvested from forests where high conservation values are threatened by management activities; - Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use; - Wood from forests where genetically modified trees are planted; - Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work. <p>Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.</p> <p>ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if poor working conditions exists the supply area. A review of federal and state laws and guidelines addressing worker safety and pay found no instances of violations. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement.</p> <p><u>Conclusion</u></p> <p>Analysis of Enviva's sourcing practices confirms the existence of appropriate laws and regulations ensuring fair pay for workers.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. Federal and State web sites c. Enviva HR policies and procedures d. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment e. Delivered Fiber Agreement f. ILO US Ratified Conventions g. Occupational Safety and Health Administration h. United States Department of Labor i. World Bank Worldwide Governance Indicators

Evidence Reviewed	All means of verification reviewed		
Risk Rating	<input checked="" type="checkbox"/> Low Risk	<input type="checkbox"/> Specified Risk	<input type="checkbox"/> 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	<p>The FSC US CWNRA finds:</p> <p>1.12 Legal employment – There is a large body of laws governing fair labor, worker safety and health. These laws protect forest workers by prescribing specific safety measures to employ and safety equipment to use while working. There is a low risk forest worker are not adequately protected.</p> <p>US ranks in the top 88th percentile in Regulatory Quality in the World Bank Worldwide Governance Indicators and in the top 89th percentile in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic criminal activity related to the violation of forest worker health and safety laws in the Enviva supply base area.</p> <p>The US Occupational Health and Safety Administration is responsible for implementing, monitoring and enforcing worker health and safety laws and regulations. Enviva complies with all applicable laws and regulation and contractually requires its suppliers to do the same. The SFI Wood Sourcing Standard requires Program Participants to adhere to health and safety laws. Enviva and its third-party suppliers will not contract with companies exhibiting poor performance. Enviva has safety manuals in place for mill workers. Enviva also has an in-depth safety program in place at each mill to prevent accidents and share best practices amongst sites. OSHA records of reportable injuries and rates are publicly available.</p> <p>Federal Law regarding forestry dictate that: Forest fire fighting and forest fire prevention occupations, timber tract occupations, forestry service occupations, logging occupations, and occupations in the operation of any sawmill, lathe mill, shingle mill, or cooperage stock mill abide by (Order 4). [75 FR 28453, May 20, 2010]</p> <p>OSHA work rules ensure workers have a right to a safe workplace. The law requires employers to provide their employees with working conditions that are free of known dangers. The OSHA law also prohibits employers from retaliating against employees for exercising their rights under the law (including the right to raise a health and safety concern or report an injury). For more information see www.whistleblowers.gov or worker rights.</p> <p>The United State Department of Labor Occupational Safety and Health Administration provides verification of enforcement. (https://www.osha.gov/dep/index.html)</p> <p><u>Additional evidence</u></p>

	<p>Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance.</p> <p>Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:</p> <ul style="list-style-type: none"> - Illegally harvest wood; - Wood harvested in violation of traditional and civil rights; - Wood harvested from forests where high conservation values are threatened by management activities; - Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use; - Wood from forests where genetically modified trees are planted; - Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work. <p>Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.</p> <p>The SFI Fiber Sourcing Standard Objective 4 requires Program Participants to adhere to health and safety laws. Enviva's ENV-SFIS-01 Certified Sourcing Implementation Manual outlines the processes Enviva uses to meet the requirement.</p> <p>ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if poor work conditions exist the supply area. This document uses many of the same sources as the FSC US CWNRA. Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure Enviva is aware of changes in the supply base area. As with the FSC US CWNRA the review determine laws and enforcement does exist to prevent occurrences of poor work conditions in the supply base area. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement.</p> <p><u>Conclusion</u></p> <p>Analysis of Enviva's sourcing practices confirms the existence of appropriate laws and regulations ensuring worker health and safety.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. FSC US CWNRA c. ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment d. ENV-SFIS-01 Certified Sourcing Implementation Manual e. Enviva Employee Handbook f. Delivered Fiber Agreement g. United State Department of Labor Occupational Safety and Health h. World Bank Worldwide Governance Indicators
Evidence Reviewed	All means of verification reviewed
Risk Rating	X Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> 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	<p>Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure it Enviva is aware of forest impact assessments, planning implementation and monitoring efforts, forestry best management practices in all of Enviva's supply areas. The analysis includes a study of carbon stocks in the supply area.</p> <p>Wetlands and peatlands are recognized as areas of high carbon stocks as well as areas of important ecological function. Where there are wetlands in the sourcing area, these are strongly protected by legislation to remain as wetlands through the Clean Water Act. No change can be made to the hydrology of wetlands without the permission of the Army Corps of Engineers, who oversee and implement CWA legislation.</p> <p>The annual growth to drain ratio of the supply base is 1.23:1 for all species, 1.08:1 for hardwood, and 1.28:1 for pine. A positive growth to drain ratio indicates that forest growth exceeds harvest removals. In the Gulf region of the U.S. South, total inventory has increased by an average of 1.2% annually between 2000 and 2017. Since 2000, US Forest Service Forest Inventory Analysis (FIA) data indicates an increase in forest area in the states covered included in the Enviva supply base area.</p> <p>Wetlands and peatlands are recognized as areas of high carbon stocks as well as areas of important ecological function. Wetlands such as swamps, ponds and bottoms are common within the supply base, but peatlands such as bogs and fens are usually associated with the Northeast United States and well outside of the supply base. The exception to this is Pocosin, which is the only Southeastern bog and is found along the Atlantic coast from Virginia to Florida and feedstocks from Pocosins are not likely to occur within the supply base because Waycross does not get feedstocks from bottomland hardwood forest systems or peatlands.</p> <p>http://water.epa.gov/type/wetlands/types_index.cfm</p> <p>While current BMP's are structured to allow selective harvesting within a wetland, guidelines are in place to protect wetland function and minimize site impacts during harvest. BMP's specifically do not allow forestry activities to alter the hydrologic conditions or drainage patterns of wetlands. By limiting harvest size and requiring leave trees and Streamside Management Zones within the wetland, BMP's work to maintain the carbon sink values associated with wetlands. The use of innovative harvesting techniques such as mat or shovel logging utilize concentrated skid trails and "mats" of felled wood to minimize ground disturbance during wetland harvest. It is common practice for logging slash to be left on site during wetland harvest and natural regeneration of the wetland takes place fairly quickly after harvest.</p> <p><u>Conclusion</u> Analysis of Enviva's supply area confirms carbon stocks are maintained.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. BMP manuals and Compliance reports c. Clean Water Act d. USDA Forest Service Forest Inventory Analysis data
Evidence Reviewed	All means of verification reviewed

Risk Rating	<input checked="" type="checkbox"/> Low Risk	<input type="checkbox"/> Specified Risk	<input type="checkbox"/> Unspecified Risk at RA
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	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	<p>Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure it Enviva is aware of forest impact assessments, planning implementation and monitoring efforts, forestry best management practices in all of Enviva's supply areas. The analysis includes a study of carbon stocks in the supply area.</p> <p>The annual growth to drain ratio of the supply base is 1.23:1 for all species, 1.08:1 for hardwood, and 1.28:1 for pine. A positive growth to drain ratio indicates that forest growth exceeds harvest removals. In the Gulf region of the U.S. South, total inventory has increased by an average of 1.2% annually between 2000 and 2017. Since 2000, US Forest Service Forest Inventory Analysis (FIA) data indicates an increase in forest area in the states covered included in the Enviva supply base area.</p> <p>Understanding the role of managed forests in forest-carbon relationships is an essential component of global carbon dynamics and greenhouse gas (GHG) reductions. The ability of forests to act as carbon storage pools (sinks) and prevent additional carbon from entering the atmosphere is a key factor in this relationship. Recent studies have shown that a "hands off" strategy of forest preservation may not always produce the desired climatic results, but sustainably managed forests can provide carbon sequestration and storage benefits as well as a range of environmental and social benefits such as timber and biomass production, clean water, wildlife habitat, and recreational opportunities. The UN Intergovernmental Panel on Climate Change (IPCC) acknowledged this in their Fourth Assessment Report: "In the long term, a sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual sustained yield of timber, fiber or energy from the forest, will generate the largest sustained mitigation benefit."</p> <p>Healthy and vigorously growing forests are efficient at capturing and storing atmospheric carbon, but older mature forests, while maintaining large carbon stores, have very low rates of additional carbon sequestration. If natural mortality is allowed to occur in these mature forests, they can actually become carbon emitters and lose the benefit of stored carbon. The harvest of forest resources from such stands provides a mechanism for capturing and utilizing stored carbon. Sustainable forest management practiced at the landscape level provides a mosaic of forest stands from young to old and maintains carbon sequestration potential of the forests. Mature stands are harvested and reforested while younger stands are managed to maintain vigor and held for future harvest. Forest management practices such as thinning and prescribed burning reduce the potential for stand mortality from natural disturbances and the carbon emissions associated with such disturbances. The decay of trees destroyed by wildfires, storms, insects and diseases emits stored carbon back into the atmosphere without any realized benefit. As long as harvests and mortality do not exceed net growth across the forest, carbon stocks will remain stable or increase through time. In the U.S. we have experienced over 70 continuous years of net forest growth exceeding removals and mortality, thus indicating forest management practices are having a positive impact on the long-term storage of</p>

	<p>carbon. Forest Inventory Analysis (FIA) data shows that all states within the Enviva supply base follow the U.S. trend of steady to increasing forested acres.</p> <p>Harvest and utilization of forest products have additional GHG reduction and carbon flow benefits beyond the forest that are often not realized in society. The premise of Enviva's operations is to utilize forest materials and residuals from wood processing facilities in order to produce renewable energy and lower GHG emissions. By accepting lower quality wood produced from forest thinnings, Enviva is promoting the sustainable forest management practices that are essential to forest-climate interactions. Energy obtained from forest biomass uses far less of the Earth's stored carbon; therefore, the use of our wood pellets reduces the flow of fossil fuel-based carbon emissions into the atmosphere. Solid wood products and wood-based products used in construction, furniture, and other industries maintain their stored carbon for the life of the product. The reuse or recycling of these wood products only compounds their impact on carbon flow. It takes less energy (embodied energy) and thus less fossil fuel to process raw forest materials into useful products than it does for other materials such as steel, aluminum, concrete, or plastic. When wood products are used in place of these other materials, there exist a real substitution effect that serves to reduce overall societal carbon emissions.</p> <p>Sustainable forest management along with the additive effect of various wood use strategies, insure that forest operations have substantial carbon sequestration, storage, and substitution benefits that reduce global GHG emissions.</p> <p>Society of American Foresters, 2011, Managing forests because carbon matters: integrating energy, products, and land management policy, Supplement to Journal of Forestry, October/November 2011, Volume 109, Number 7S</p> <p>http://www.fs.fed.us/pnw/pubs/journals/pnw_2011_malmsheimer001.pdf</p> <p>http://www.woodforgood.com/assets/Downloads/AHEC%20Carbon%20Storage%20through%20Forest%20Management.pdf</p> <p>Forest Inventory Analysis Data: http://www.fia.fs.fed.us/</p> <p>Waycross does not get feedstocks from bottomland hardwood forest systems or peatlands that would be considered high carbon stock areas.</p> <p><u>Conclusion</u></p> <p>Analysis of Enviva's supply area confirms carbon stocks are maintained.</p>
Means of Verification	<ul style="list-style-type: none"> a. Preamble citations b. SAF Journal of Forestry c. Ecological objectives can be achieved with wood derived bioenergy (peer reviewed letter) d. AHEC article (peer reviewed) e. Forest Inventory Analysis Data
Evidence Reviewed	All means of verification reviewed
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.10.1	Genetically modified trees are not used.
Finding	<p>The FSC US CWNRA findings conclude: “Currently there is no use of GMO trees for commercial use, but the US might be close to approving the use of such. If this happens it will not be possible to identify the use of that GMO to a certain MU, which is why there might be specified risk in the future. But as the situation is now in the US there are no commercial GMO timber trees.</p> <p>There are no commercial uses of Genetically Modified Organisms (GMO's) inside the Enviva LP supply area. Enviva communicates its desire to avoid these sources in its MWPA. Excerpt from Enviva's PEFC Chain of Custody Due Diligence System:</p> <p>“International groups have general consistency regarding the term GMO to ensure that it is not confused with hybrids, cultivars, and breeds, which are derived from traditional breeding programs. A GMO is an organism that has been transformed by the insertion of one or more genes (called transgenes). Often the inserted genes are from a different species than the recipient organism. Genetic modification does not include traditional breeding or natural hybridization, i.e. GM trees cannot be obtained through conventional tree breeding methods”.</p> <p>There is a single synthesis document that provides an up to date (as of 2004) evaluation of forest GMO (Genetically Modified Organisms). Currently, the only commercial user of GMO trees is China and only a single species, Populus nigra (Black Poplar, Lombardy Poplar).</p> <p>The majority of GMO tree research takes place in the U.S. As of 2004, there were field trials of multiple genera, but no commercial plantings.</p> <p><u>Additional evidence</u> Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva uses contractual language in its Delivered Fiber Agreement requiring supplier to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:</p> <ul style="list-style-type: none"> - Illegally harvest wood; - Wood harvested in violation of traditional and civil rights; - Wood harvested from forests where high conservation values are threatened by management activities; - Wood harvested from old growth or semi-natural forests being converted to plantations or non-forest use; - Wood from forests where genetically modified trees are planted; - Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work. <p>Enviva requires all suppliers to sign a Delivered Fiber Agreement. Delivered Fiber Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstocks from suppliers who it has an established business relationship and a signed agreement.</p>

	<p><i>Primary Feedstock</i></p> <p>Enviva uses its proprietary Tract Set up process for all primary wood purchases. Specifically, Enviva maintains a robust tracking and monitoring program to ensure that all our suppliers deliver wood that is sourced according to our expectations. The information Enviva collects for every tract its suppliers harvest includes; data on the forest type, age, GPS coordinates, acreage, and the percent of volume from that tract being sold to Enviva. Before agreeing to accept material from a certain tract, Enviva's Procurement Foresters must obtain this tract-level data and enter it into our database, which generates a unique tract ID. Then, upon delivery to the mill, each load is linked to that tract's ID number. As a result, Enviva knows the tract-level attributes for all the primary wood entering the mill. Enviva conducts risk based field sampling audits and can assure timber GMO species are not in the supply area or feedstock. During annual certification audits an independent certifying body confirms Enviva's internal findings as part of its third-party audit assessment.</p> <p><i>Secondary Feedstock</i></p> <p>Enviva's annual Supplier Audit Checklist Form process allows secondary feedstock suppliers to meet the requirements described in SBP's Normative Interpretations Document. The process collects information about the suppliers sourcing area, species processed at the mill, the types of information collected about the landowner and other pertinent information as described in the guidance found in Standard 2 Section 8.4 of the Interpretations. This information is mapped and compared to Enviva's supply base area and against known areas with potential high conservation value to ensure that any risk to HCV values associated with suppliers of secondary feedstocks is appropriately included in the SBP supply base evaluation process to ensure the suppliers' sourcing practices do not pose a threat to these areas. Enviva purchases primary feedstock from many of the same timber harvesting crews as its secondary feedstock suppliers. Since Enviva uses its Tract Set up process to purchase primary feedstock it, by extension, has quite a bit of information about the source tracts of its secondary feedstock suppliers.</p> <p>ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment contains the work done to determine if commercial timber GMO species the supply area. This document uses many if the same sources as the FSC US CWNRA. Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment is reviewed annually to ensure Enviva is aware of changes in the supply base area. As with the FSC US CWNRA the review determine laws and enforcement does exist to prevent the establishment of commercial timber GMO species in the supply base area. Findings are incorporated into Enviva's ENV-COC-03 Controlled Wood/Controlled Source Risk Assessment, this supply base evaluation and revisions to the Delivered Fiber Agreement.</p> <p>Enviva did not find its wood supply areas on any lists contained in the FAO preliminary review of biotechnology in forestry (http://www.fao.org/docrep/008/ae574e/ae574e00.htm).</p> <p>There are no commercial uses of genetically modified trees taking place across the wood supply area. Enviva is therefore confident that its wood supply does not source wood from forests in which genetically modified trees are planted.</p> <p><u>Conclusion</u></p> <p>Enviva does not use genetically modified trees.</p>
Means of Verification	<p>a. FSC US CWNRA</p> <p>b. ENV-COC-03 Controlled Wood Risk Assessment</p>

	c. Tract Set up process d. Supplier Audit Checklist Process e. Delivered Fiber Agreement
Evidence Reviewed	All means of Verification reviewed
Risk Rating	X Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA