



Supply Base Report:

Pacific BioEnergy Prince George Limited Partnership

May 11, 2020

Second Surveillance Audit

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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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Version 1.1 published 22 February 2016

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1 Overview

Producer name: Pacific BioEnergy Prince George Limited Partnership (PGLP)

Producer location: 9988 Willow Cale Forest Service Road, prince George, BC, Canada, V2N7A8

Geographic position: 53° 49' 43" North/122° 43' 45" West

Primary contact: Joe Kenney, P.Eng, RPF, Woodlands Manager

Company website: <https://www.pacificbioenergy.ca/>

Date report finalised: Nov 27 2020

Close of last CB audit: Nov 26th 2020

Name of CB: Control Union Certifications B.V.

Translations from English: No

SBP Standard(s) used: Standards 2, 4 & 5

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

SBP Endorsed Regional Risk Assessment: N/A

Weblink to SBE on Company website: n/a given a SBE not completed

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

2 Description of the Supply Base

2.1 General description

PGLP's feedstock all originates in the province of British Columbia within the North and South Forest Areas as defined by the MFLNRO & RD. Specifically, feedstock is supplied from the following Forest Regions – 1) Northwest 2) Omineca 3) Skeena 4) Cariboo 5) Kootenay/Boundary 6) Thompson/Okanagan and more recently from West Central Alberta and specially from West Fraser Mills Ltd.'s Hinton Wood Products FMA #8800025. PGLP utilizes feedstock from the supply base from other forestry firms sawmill waste, logging waste piles and more recently, from biomass log harvests. Approximately 223,462 Oven DryTonnes (ODT's) of feedstock was delivered from three supply types:

- a. 1^o feedstock; post-harvest forest residuals (i.e. tops and limbs from logging slash piles) -28.6%
- b. 1^o feedstock; biomass logs – 49.6%,
- c. 2^o feedstock; sawmill residuals – 21.7%.

The majority of forest management and harvesting within the Supply Base Area is conducted on Crown lands owned and controlled by the province of British Columbia and the province of Alberta. Harvesting of the Crown lands in the supply base is either conducted through the province of British Columbia's BC Timber Sales (BCTS) Program or by companies holding tenures issued by the provinces. Timber harvesting licences are area based licences or volume based licences with the management and rate of harvest controlled by the provinces through their environmental regulatory frameworks.

PGLP commenced harvesting activities for biomass logs due to a decreasing volume of fibre available from sawmills in British Columbia and Alberta as well as limited, economically viable post logging waste. Harvesting by PGLP occurs on their non-replaceable forest licences in the Quesnel (NRFL A76553, A88189 & A91936) and Prince George (NRFL A93518) Timber Supply Areas (TSA's). In addition, PGLP purchases logs from private land owners clearing their land for agriculture/other purposes as well as from British Columbia Timber Sales (BCTS) forest management certified, auctioned timber sales. All sources of biomass logs originate from within the Supply Base.

PGLP uses primarily SPF residuals (spruce/pine/balsam fir) with minor inputs of other coniferous species (black spruce/hemlock/Douglas-fir) and some hardwoods (cottonwood/aspens/birch). No softwood or hardwood species native to British Columbia or Alberta are listed in CITES.

PEFC™ Chain of Custody certificate with a PEFC certified claim. Any portion of the residuals transfer that is not PEFC™ certified is PEFC™ controlled and has been screened through PGLP's PEFC™ due diligence system^[1]. The licensees who provide the sawmill residuals harvest timber from their certified forestlands and purchase some amount of logs from others certified or uncertified forestlands. In 2019 47.9% of the feedstock was SBP-certified and 52.1% SBP-controlled. PGLP does not procure any feedstock that is not SBP-compliant or SBP-controlled.

While the regulatory frameworks differ in BC and Alberta both regulatory constructs provide direction for tenure holders for their operations.

^[1] Consistent with the Normative Interpretations Document August 17, 2018 section #5, page #4.

British Columbia

British Columbia's Forest Range and Practices Act (FRPA) and pursuant regulations identify eleven resource values that must be identified/addressed in a site plan before the commencement of authorized timber harvesting on Crown land (<https://www2.gov.bc.ca/gov/content/industry/forestry/managing-our-forest-resources/integrated-resource-monitoring/forest-range-evaluation-program>). Under FRPA forest managers are accountable for the results of resource protection through a rigorous government compliance and enforcement regime. Ingredients of results-based forest management include: (a) professional reliance, (b) stakeholder consultation, (c) healthy forest industry, and (d) a credible third-party auditor, the Forest Practices Board, which ensures the environment is protected. Forest companies harvesting on Crown land must submit a Forest Stewardship Plan consistent with objectives of local land use plans, species at risk, old growth, streams, cutblock size, and retention of coarse woody debris and wildlife trees. Results are monitored by forest professionals responsible for implementation of the plan as well as officials from Compliance and Enforcement, the law enforcement arm of the MoFLNRO & RD. C&E's purpose is to make sure that resource management laws are being followed and to take action where there is non-compliance (<https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/natural-resource-law-enforcement/natural-resource-officers>). BC's Ministry of Environment ensures conservation of Species at Risk (www.env.gov.bc.ca/wld/frpa/species.html) and Canada is a member of the Convention on International Trade in Endangered Species (www.cites.org/eng/disc/parties/chronolo.php).

Alberta

Alberta Agriculture and Forestry (AAF) is charged with implementing the regulatory construct that provides direction for tenure holders and include the:

- Forest Act/regulations,
- Forest and Prairie protection Act/regulations
- Forest Reserves Act/regulation.

(<https://www.agric.gov.ab.ca/app21/ministrypage?cat1=Ministry&cat2=Legislation>). AAF provides further guidance through Directive Letters issued from time to time for specific issues. Tenure holders must develop and gain approval of forest management plans for their area based Forest Management Agreement (FMA) areas which include the operations of Timber Permit/Quota Holders operating on volume based licences within the FMA's. Forest Management Plans address government's requirements inclusive of conservation, biodiversity and cultural/archaeological values

(<https://www.agric.gov.ab.ca/app21/forestrypage?cat1=Forest%20Management&cat2=Forest%20Management%20Plans>) with lower level plans (Annual Operating Plans and Final Harvest Plans) having to address legal requirements and company commitments identified in the Forest Management Plans. AAF monitors operations through their compliance and enforcement program (<https://www.agric.gov.ab.ca/app21/forestrypage?cat1=Forest%20Management&cat2=Compliance%20%26%20Enforcement>).

PGLP's calendar 2019 feedstock consumption was ODT's and consisted of:

- 75,553 ODT's of forestry waste grinding/primary feedstock,
- 95,731 ODT's of biomass log harvesting/primary feedstock, and
- 59,289 ODT's being sawmill residuals/secondary feedstock.

The increase in biomass log harvesting is due to the reduction in secondary feedstock available from local sawmills coupled with the curtailments at sawmills through 2019 into 2020 as well as the economic margin of forestry waste grinding. Consistent with PBTC's goal, high value logs are sold to willing sawmill's, higher value pulp logs sold to the local pulp mills and low grade logs sold to PGLP for grinding into input raw material.

2.2 Actions taken to promote certification amongst feedstock supplier

No actions were taken or required given a majority of the fibre procured is forest management or chain of custody certified.

The calendar year 2019 raw material inputs originate from:

- 28.6% (77,931 ODT's) forestry waste pile grinding/1^o feedstock,
- 49.6% (134,839 ODT's) biomass log harvesting/1^o feedstock, and
- 21.7% (59,305 ODT's) sawmill residuals/2^o feedstock.

Suppliers hold forest management (CSA Z809 FM/SFI®- FM) certification for their tenured forestlands and PEFC™ chain of custody certification in most cases with contracts that identify the certification and origin for the waste piles or harvest areas. Invoices/statements have claims to support the PEFC™ certified sawmill residuals.

Where PGLP completes biomass log harvesting or grinds logging waste it is screened through PBLP's PEFC due diligence system prior to purchase. In 2019 29% of the biomass log harvesting came from certified forest lands with remainder coming from uncertified forest lands.

Forest certification is common in North America and in Canada, some of the largest tracts of forestland in North America are certified to Canada's national forest management standard, CSA Z809-16 and SFI® forest management standards and to a minor extent, Canada's new FSC forest management standard.

2.3 Final harvest sampling programme

In 2019 78.2% of the fibre was procured directly from the forest (212,770 ODT's). Of that 36.6% (77,931 ODT's) was from grinding waste piles left from timber harvesting and 63.4% (134,839 ODT's) was from biomass log harvesting. Traditionally the waste pile material at the cutblock edge was burned as waste and the use as biomass fibre both utilizes this waste for energy production lessening the release of carbon to the atmosphere wh. The remaining 21.7% (59,305 ODT's) of the fibre procured was sawmill residual fibre (38.5% sawdust and 61.5% shavings) which was traditionally burned in beehive burners.

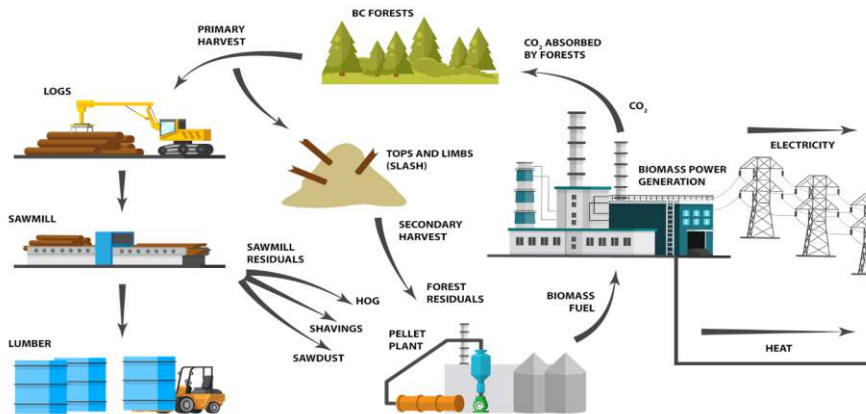
For the calendar year 2020 (Q1-2020) raw material inputs originate from:

- 35.8% (84,933 ODT's) forestry waste pile grinding/1^o feedstock,
- 35.7% (84,087 ODT's) biomass log harvesting/1^o feedstock, and
- 28.5% (67,704 ODT's) sawmill residuals/2^o feedstock.

Procurements of primary raw material is expected increase (waste piles and biomass harvesting) over 2020 due to the continued sawmill curtailments and the COVID-19 pandemic.

Data to support the grinding and biomass harvesting programs continues to be summarized in the annual worksheets.

2.4 Flow diagram of feedstock inputs showing feedstock type



2.5 Quantification of the Supply Base

Supply Base

a. Total Supply Base area (ha):

In British Columbia the management units are Timber Supply Areas (TSA's) with volume based agreements and area based agreements including Tree Farm Licences (TFL's), Community Forest Agreements (CFA's) and Woodlot Licences (WL's). Data and analysis occurs at the TSA level and for the area based licences, at the TFL, CFA and WL level. In Alberta the forested area (Green Zone) is divided into Forest Management Units (FMU) with most FMU's having Forest Management Agreement's (FMA) allocated over the FMU/s. Non allocated FMU's may or may not have volume based quota licences allocated. FMA's are managed by the tenure holder inclusive of the Forest Management Plan and timber supply estimates while non-allocated FMU's are managed by AAF.

Currently PGLP's supply base includes the following management units inclusive of CFA's/WL's) give they are not identified on the map appended to this SBR:

- Quesnel TSA/TFL #52,
- Williams Lake TSA,
- Prince George TSA/TFL #30 & #52,
- Mackenzie TSA,
- Dawson Creek TSA/TFL#48
- Robson Valley TSA
- West Central Alberta/FMA #8800025.

Data on certified areas derived from Certification Canada (<http://certificationcanada.org/index.php/maps-en/provincial/bc>) and (<http://certificationcanada.org/index.php/maps-en/provincial/ab>). Data on the uncertified percentages and the percentage area uncertified for each TSA and FMA/FMU. In the case of the Prince George TSA there are three forest districts so the percentage is for each forest district.

Information on Timber Supply Areas (TSA's), Tree Farm Licences (TFL's) and their gross areas/timber harvesting land base areas and allowable annual cuts are derived from the most current timber supply review documents which can be found at <https://www2.gov.bc.ca/gov/content/industry/forestry/managing-our-forest-resources/timber-supply-review-and-allowable-annual-cut>.

Information on allowable annual cuts for FMU's/FMA's can be found at <https://open.alberta.ca/opendata/provincial-timber-harvest-and-annual-allowable-cut-alberta-crown-lands>.

Specifically, Hinton Wood Products AAC can be viewed at <https://open.alberta.ca/publications/fma-oc-565-2007>.

Secondary feedstock is sourced from the same areas given the sawmills procure their raw material (i.e. logs from these areas) and the level of certification varies based on the volume procured from private/uncertified lands. All feedstock is screened through PBLP's PEFC™ certified due diligence system.

TSA/Mgmt Unit	TFL/FMA/FMU	Total Area (ha)	Timber Harvesting Landbase Area or Contributing Landbase (ha)	Licensee	Certification Type	Certified Area (ha)	Uncertified % (of TSA/TFL/FMU/FMA)	Comments
Dawson Creek	#48	2,300,000	758,335	LP Canada	SFI	2,960,620	0	
				West Fraser	SFI	574,876	0	
				BCTS	SFI	468,761	0	
				-	-	-	6.0	
Mackenzie	-	6,410,000	1,500,726	Canfor	SFI	13,403,454	0	
				BCTS	SFI	1,827,231	0	
				Conifex	SFI	2,127,801	0	
				Mackenzie Fibre	SFI	460,999	0	
				-	-	-	5.5	
Williams Lake	-	4,930,000	1,830,000	Tolko	SFI	1,821,895	0	
				BCTS	SFI	1,952,379	0	
				West Fraser	SFI	559,825	0	
				-	-	-	21.3	
Prince George	#30 #53	7,970,000	3,506,800	Canfor	SFI	13,403,454	0	Includes the PG/Vanderhoof and Fort St. James Forest Districts
				Sinclair Group	SFI	377,138	0	
				BCTS	SFI	1,827,213	0	
				Conifex	SFI	2,127,801	0	
				L&M Lumber	SFI	126,090	0	
				Carrier Lumber	SFI	153,615	0	
				West Fraser	SFI	383,703	0	
				Dunkley	SFI	194,842	0	
				-	-	-	34.2/37.4/30.2	
Quesnel	#52	2,077,293	1,020,699	Tolko	SFI	1,821,895	0	
				BCTS	SFI	1,952,379	0	
				West Fraser	SFI	787,162	0	
				C&C Wood Products	SFI	80,000	0	
				-	-	-	27.3	
Robson Valley	#30	1,458,588	132,497	Carrier Lumber	SFI	153,615	0	
West Central Alberta	FMA 8800025	1,022,465	988,774	West Fraser Mills Ltd.	SFI	988,774	0	Operates as Hinton Wood Products

A detailed map of British Columbia and the TSA's/TFL's can be reviewed at https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/district-contacts/natural_resource_regions_and_districts_map2017.png.

A detailed map of Alberta's provincial forest areas and FMU's/FMA's can be reviewed at <https://open.alberta.ca/publications/forest-management-agreement-boundaries-map>.

- b. Tenure by type (ha): BC - 95% public tenures (forest licence [replaceable & non-replaceable]/tree farm licence, community forest agreements, woodlots, and forest licence to cut with minor private lands held as part of TFL's. Alberta – 95% public tenures (FMA's/quaota licences/commercial timber permits).
- c. Forest by type (ha): sub-boreal
- d. Forest by management type (ha): 100% managed natural forest
- e. Certified forest by scheme (ha): ~95%. Refer to table above.

Feedstock

- f. Total volume of Feedstock (calendar 2019): 272,074 ODT's
- g. Volume of primary feedstock: 212,770 ODT's
- h. Percentage of primary feedstock:
 - Certified to an SBP-approved Forest Management/CoC Scheme – 40.5%
 - Not certified to an SBP-approved Forest Management/CoC Scheme – 59.5%
- i. Lodgepole pine – *Pinus contorta*, Hybrid white spruce – *Picea glauca x engelmannii*, Engelmann Spruce *Picea engelmannii*, Douglas fir – *Pseudotsuga mensezii*, Black spruce – *Picea mariana*, Western hemlock – *Tsuga heterophylla*, Sub-alpine fir (Balsam) – *Abies lasiocarpa*, Western Red Cedar – *Thuja plicata*, Western Larch – *Larix occidentalis*, Paper Birch – *Betula papyrifera*, Trembling aspen – *Populus tremuloides*, Black cottonwood – *Populus balsamifera*
- j. Volume of primary feedstock from primary forest: 171,284 ODT's
- k. 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/CoC – 40.5%
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management/CoC Scheme – 59.5%
- l. Volume of secondary feedstock: specify origin and type – 59,305 ODT's sawmill waste (sawdust/shavings) from the local area (in/around Prince George, BC) and from Hinton Wood Products, Hinton, Ab).
- m. Volume of tertiary feedstock: specify origin and composition – 0%

3 Requirement for a Supply Base Evaluation

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

PGLP has determined that a SBE is not required in order to classify SBP-compliant feedstock as SBP-certified given all feedstock is sourced within the scope of PGLP/PBTC's PEFC CoC Certificate and is either PEFC-certified or PEFC-controlled sources.

PGLP is awaiting the completion of a regional risk assessment for British Columbia and Alberta being completed by the Wood Pellet Association of Canada. Once completed PGLP will determine if they wish to proceed with a SBE for the lesser portion of their feedstock that is PEFC-controlled sources noting the decision is driven by the economic notions of: (1) customer demand, and (2) willingness to pay.

Given a SBE is not required the Annex 1 v1.1 template, " Supply Base Report for Biomass Producers: Annex 1 v1.1" (April 2020) has not been completed.

4 Supply Base Evaluation

4.1 Scope

N/A

4.2 Justification

N/A

4.3 Results of Risk Assessment

N/A

4.4 Results of Supplier Verification Programme

N/A

4.5 Conclusion

N/A

5 Supply Base Evaluation Process

N/A

6 Stakeholder Consultation

Although a SBE was not completed, a consultation with stakeholders was conducted by Control Union on October 19, 2018 with a deadline to submit comments by November 19, 2018. The process for stakeholder consultation consisted of sending direct emails to different stakeholder categories including provincial/federal institutions, local non-governmental organizations, forest owners associations, academic and research institutions. Comments from stakeholders were not received.

6.1 Response to stakeholder comments

N/A

7 Overview of Initial Assessment of Risk

N/A

8 Supplier Verification Programme

8.1 Description of the Supplier Verification Programme

N/A

8.2 Site visits

N/A

8.3 Conclusions from the Supplier Verification Programme

N/A

9 Mitigation Measures

9.1 Mitigation measures

N/A

9.2 Monitoring and outcomes

N/A

10 Detailed Findings for Indicators

N/A

11 Review of Report

11.1 Peer review


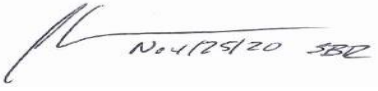

The Woodlands Manager, a Professional Engineer/Registered Professional Forester registered to practice in the province of British Columbia reviewed the SBR. The Woodlands Manager has extensive experience and education in the field of natural resource management and is competent to perform such a review.

The SBR is simply a repetitive description of PGLP's annual raw material procurement in the format required by the SBP with the tracking data maintained in PGLP's calendar year worksheets.

11.2 Public or additional reviews

No public or additional reviews were deemed necessary or requested.

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	P.L. Carruthers, MF, RPF #2873 	Independent Consulting Forester	Nov 24 th 2020
	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:	J. Kenny, P.Eng 	Woodlands Manager	Nov 24 th 2020
	Name	Title	Date
Report approved by:	John Stirling 	President and CEO	Nov 24 th 2020
	Name	Title	Date

13 Updates

13.1 Significant changes in the Supply Base

No changes of significance in the supply base in calendar 2019 as projected in the 2019 SBR that reported on 2018 data and the forecast into 2019. 2020 procurement may change given the ongoing sawmill curtailments due to market conditions and the COVID-19 pandemic.

13.2 Effectiveness of previous mitigation measures

N/A – mitigation measures not required given all raw material input is PEFC certified or controlled sources.

13.3 New risk ratings and mitigation measures

N/A – mitigation measures not required given all raw material input is PEFC certified or controlled sources.

13.4 Actual figures for feedstock over the previous 12 months

Calendar year 2019 – no change from the data presented in sec. 2.5

- A Total volume of Feedstock (calendar 2019): 272,074 ODT's
- B Volume of primary feedstock: 212,770 ODT's
- C Percentage of primary feedstock:
- Certified to an SBP-approved Forest Management/CoC Scheme – 40.5%
 - Not certified to an SBP-approved Forest Management/CoC Scheme – 59.5%
- D Lodgepole pine – *Pinus contorta*, Hybrid white spruce – *Picea glauca x engelmannii*, Engelmann Spruce *Picea engelmannii*, Douglas fir – *Pseudotsuga mensezii*, Black spruce – *Picea mariana*, Western hemlock – *Tsuga heterophylla*, Sub-alpine fir (Balsam) – *Abies lasiocarpa*, Western Red Cedar – *Thuja plicata*, Western Larch – *Larix occidentalis*, Paper Birch – *Betula papyrifera*, Trembling aspen – *Populus tremuloides*, Black cottonwood – *Populus balsamifera*
- E Volume of primary feedstock from primary forest: 171,284 ODT's
- F 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/CoC – 40.5%
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management/CoC Scheme – 59.5%
- G Volume of secondary feedstock: specify origin and type – 59,305 ODT's sawmill waste (sawdust/shavings) from the local area (in/around Prince George, BC) and from Hinton Wood Products, Hinton, Ab).
- H Volume of tertiary feedstock: specify origin and composition – 0%

13.5 Projected figures for feedstock over the next 12 months

Calendar year 2020 – data for Q1-2020 presented in sec. 2.5 and forecast forward for the remainder of the calendar year.

- a. Total volume of Feedstock (calendar 2019): 300,000 ODT's
- b. Volume of primary feedstock: 210,000 ODT's
- c. Percentage of primary feedstock:
 - Certified to an SBP-approved Forest Management/CoC Scheme - 50%
 - Not certified to an SBP-approved Forest Management/CoC Scheme - 50%
- j. Lodgepole pine – *Pinus contorta*, Hybrid white spruce – *Picea glauca x engelmannii*, Engelmann Spruce *Picea engelmannii*, Douglas fir – *Pseudotsuga mensezii*, Black spruce – *Picea mariana*, Western hemlock – *Tsuga heterophylla*, Sub-alpine fir (Balsam) – *Abies lasiocarpa*, Western Red Cedar – *Thuja plicata*, Western Larch – *Larix occidentalis*, Paper Birch – *Betula papyrifera*, Trembling aspen – *Populus tremuloides*, Black cottonwood – *Populus balsamifera*
- n. Volume of primary feedstock from primary forest: 210,000 ODT's
- o. 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/CoC - 50%
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management/CoC Scheme - 50%
- p. Volume of secondary feedstock: specify origin and type – 90,000 ODT's sawmill waste (sawdust/shavings) from the local area (in/around Prince George, BC) and from Hinton Wood Products, (Hinton, Ab).
- q. Volume of tertiary feedstock: specify origin and composition – 0%