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## Controlled Wood/Due Diligence System Summary for Public Distribution US Biomass

*Note: This information will be included in the public summary of the certification report by the FSC Certification Body on the FSC database. According to FSC STD-40-005 V3.1, Section 6 Publicly available information, 6.1: “The organization shall provide a written summary of its DDS to the certification body. The written summary shall include the following information:*

- a) A description of the supply area(s) and respective risk designation(s);*
- b) Reference to the applicable FSC risk assessment;*
- c) The organization’s own risk assessment (excluding confidential information);*
- d) The procedure for filing complaints; and*
- e) Contact information of the person or position responsible for addressing complaints.”*

### Due Diligence System Scope

US Biomass is implementing this Controlled Wood/Due Diligence System Procedure to achieve conformance with the Forest Stewardship Council® (FSC®), Sustainable Forestry Initiative® (SFI®), and PEFC™ Standards in order to avoid material from unacceptable sources. This procedure is part of the Chain of Custody and Controlled Wood program addressing wood procurement operations for company mills in Georgia. The wood and fiber suppliers are categorized according to the following:


- a) Field-processed wood chips from suppliers that harvest trees from uncertified forests and bring these chips directly from the forest to US Biomass’ mill;
- b) Field-processed wood chips from suppliers that harvest trees (within the scope of the company’s PEFC Chain of Custody; PEFC status only) from SFI or Tree Farm-certified forests and bring these chips directly from the forest to US Biomass’ mill; and
- c) Woody residuals which are sourced indirectly through sawmills.

Types a, b, and c are included in the company’s controlled wood/due diligence system program.

### Supply Area

All certified wood and fiber for US Biomass’s manufacturing facility in South Carolina are from within the U.S. States of Georgia and South Carolina. Sourcing is described in Appendix B

Further, US Biomass has identified all of its wood suppliers and their incoming material as coming from certified forests and/or controlled material/controlled sources/SBP compliant feedstock. The USB POSITION has notified all of its suppliers that it will not accept “Unacceptable/controversial” sources of wood. It has incorporated the controlled wood restrictions in its agreements.

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### FSC National Risk Assessment and Risk Designations

The company relies on the FSC U.S. Controlled Wood National Risk Assessment (NRA) to assess the five FSC unacceptable sources of wood:

1. Wood harvested illegally.
2. Wood harvested in violation of traditional and civil rights.
3. Wood harvested from forests with a high conservation value that is threatened by management activities.
4. Wood harvested from forests being converted to plantations or non-forest use.
5. Wood from forests in which genetically modified trees are planted.

The NRA found “low risk” for FSC Categories 1, 2, and 5 for all forested portions of the conterminous 48 states. There are 3 mapped areas of specified risk that overlap the company’s supply area, in two different categories, high conservation values, and forest conversion:

FSC Category 3- High Conservation Values

- Late Successional Bottomland Hardwoods
- Native Longleaf Pine Systems

FSC Category 4 - Forest Conversion

For Specified Risks Associated with Category 3 High Conservation Values the company has implemented the mandatory Control Measures and has selected the mitigation options listed below.

Specified Risk	Mitigation Option
Late Successional Bottomland Hardwoods	Central Theme - <i>Implement Management Activities</i> : Support is provided for the Forest Stewards Guild Note: The company uses small percentage of hardwoods, and will not source from bottomland hardwood sites.
Native Longleaf Pine Systems	Central Theme - <i>Education &amp; Outreach</i> : Provide funding to the Longleaf Alliance, in general support area.


For Specified Risks Associated with Category 4 Conversion the company has implemented Control Measure 4.2. This including attendance at the regional meetings by a representative, review of the meeting reports, and providing outreach materials to suppliers.

### Company PEFC Risk Assessment

The company’s PEFC risk assessment found that there is no material from controversial sources as defined by PEFC.

### Procedure for Filing Complaints, Including Contact Person

Complaints regarding the US Biomass Due Diligence System and/or Risk Assessment should be directed to the company’s Management Representative (see below). Complaints must be in writing and sent by mail or email. US Biomass will acknowledge the complaint as soon as practical, and will provide an initial response to the complaint within two weeks.

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US Biomass will assess each complaint and determine whether it is substantiated. If so, US Biomass will attempt to resolve the complaint directly with the person or organization that filed it. If the complaint can't be resolved, then the company would notify the FSC US National Office and the certification body. The company may conduct field or office verification within two months, as appropriate to the situation.

Any complaints regarding the Risk Assessment which are determined to be substantiated will be forwarded to the appropriate FSC U.S. National office. While any substantiated complaints are pending, the precautionary principle shall be employed with respect to the continued sourcing of the relevant material.

If the results of investigation determine that control measures are needed, these will be implemented by the Company and affected suppliers and verified before that source of wood or fiber is included in the controlled wood program.

US Biomass will inform the complainant, the certification body, and the relevant FSC National Office of the results of the complaint and any actions taken towards its resolution. US Biomass's Management Representative is responsible for maintaining copies of relevant correspondence and recording and filing all complaints received and actions taken.

US Biomass has appointed the a Management Representative with overall responsibility for compliance with the applicable Chain of Custody requirements of the FSC® and PEFC™ standards, including complaints.

**Management Representative**  
Martijn Van Zadelhoff, President  
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