



STANDARD OPERATING PROCEDURE

Title: Biodiversity Management Plan	Document #: SOEHS500-9.01	Rev #: 1
Issued by: Kelli Tracy	Issued Date: 10/05/2023	Revision Date: 09/11/2025
Approval: Ronke Akano	Signature:	
Approval: Kole Gray	Signature:	

Biodiversity and Ecosystem Services Risk and Impact Assessment

JW Aluminum – Mt Holly, SC Facility

IBAT Proximity Report. Report from the Integrated Biodiversity Assessment tool on August 16, 2023

IBAT Species Threat Abatement and Restoration Report from the Integrated Biodiversity Assessment Tool on August 16, 2023

Defined Area of Influence: 5km

JW Aluminum – Russellville, AR Facility

IBAT Proximity Report. Report from the Integrated Biodiversity Assessment tool on August 16, 2023

IBAT Species Threat Abatement and Restoration Report from the Integrated Biodiversity Assessment Tool on August 16, 2023

Defined Area of Influence: 5km

In August 2023, JW Aluminum conducted a biodiversity risk assessment thru the Integrated Biodiversity Assessment Tool (IBAT) for both JW Aluminum facilities. The report was conducted using 1km, 3km, and 5km buffers around each facility. This risk assessment identifies three key categories within your area of influence including protected areas, key biodiversity areas, and species on the IUCN Red List within 50km of your search area. A risk assessment to determine the threat abatement and restoration score for each facilities general area was also performed. A summary of the reports are below.

Mt. Holly, SC Risk Assessment Review

The integrated Biodiversity Assessment tool risk assessment tool identified the following:

Protected Areas: 0

Key Biodiversity Areas: 1 – Medway Plantation

IUCN Red List: 110 within 50km area

Threat Abatement Score: 8.51 (Low)

Restoration Score: 1.04 (Very Low)

Medway Plantation, approximately two miles to the northeast, was identified in the assessment as a key biodiversity area as a breeding ground for the Red-Cockaded Woodpecker, which is classified as “near threatened”. Our area of influence currently contains relatively low numbers of threatened species, individual species’ ranges, and/or species that are severely threatened. The majority of the identified IUCN Red List of Threatened Species are marine species that are included due to the facility’s general location in relation to the coastline. As part of the recent Title V Air Permit renewal, the MTH facility performed air modeling to ensure compliance with ambient air quality standards. Results were well below levels that would have impacts on the



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ambient air quality standards. JW Aluminum's operation has no impact on threatened marine species. Stormwater controls are in place along with a documented and approved Stormwater Pollution Prevention Plan (SWPPP) to control discharges associated with stormwater that could make their way to the Cooper River and flow downstream to the Charleston Harbor.

Based on the distance from the key biodiversity area and an assessment of how our land use and activities could potentially impact the species, JW Aluminum has determined that the risk to biodiversity is low.

Russellville, AR Risk Assessment Review

The integrated Biodiversity Assessment tool risk assessment tool identified the following:

Protected Areas: 0

Key Biodiversity Areas: 0

IUCN Red List: 37 within 50km area

Threat Abatement Score: 1.29 (Very Low)

Restoration Score: 1.2 (Very Low)

The Russellville, AR risk assessment did not identify any Protected Areas or Key Biodiversity within the defined area of influence. There were 37 identified species on the IUCN Red List of Threatened Species list.

Based on the distance from the key biodiversity area and an assessment of how our land use and activities could potentially impact the species, JW Aluminum has determined that the risk to biodiversity is low.

Biodiversity Management

After JW Aluminum's biodiversity assessment was completed and our area of influence studied, it was determined that the risks and potential impacts associated with our activities and value chains are low. No Biodiversity Action Plan is required.

Alien Species

Resources: Global Invasive Species Database (2023): United States-South Carolina

National Invasive Species Information Center – South Carolina

Clemson University – Regulatory Services – State Invasive Species

Global Invasive Species Database (2023): United States-Arkansas

National Invasive Species Information Center – Arkansas

University of Arkansas – Cooperative Extension Service – Arkansas Invasives



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JW Aluminum has identified limited alien species that are in their geographical areas. All of the listed alien species identified are not present at either JW Aluminum facility. The risk of introduction or spread of alien species at our facilities are very low.

Formosan termites are the most likely alien species at risk of being introduced through its operations. The steps taken to reduce the potential includes:

- utilizing contractors that are implementing proper housekeeping and maintenance, and
- completing routine inspections of wood pallets, to ensure they are not carrying alien species.

Protected Areas

JW Aluminum – Mt Holly, SC Facility

IBAT Proximity Report. Report from the Integrated Biodiversity Assessment tool on August 16, 2023

USGS PAD-US Protected Areas Database – Goose Creek, SC

The integrated Biodiversity Assessment tool risk assessment tool identified the following:

Protected Areas: 0

Key Biodiversity Areas: 1 – Medway Plantation

The USGS PAD-US Protected Areas Database revealed no protected areas in are near vicinity. The report did reveal a non-governmental organization conservation easement that is 5,283 acres to the East of our facility.

JW Aluminum – Russellville, AR Facility

IBAT Proximity Report. Report from the Integrated Biodiversity Assessment tool on August 16, 2023

USGS PAD-US Protected Areas Database – Russellville, AR

The integrated Biodiversity Assessment tool risk assessment tool identified the following:

Protected Areas: 0

Key Biodiversity Areas: 0

The USGS PAD-US Protected Areas Database revealed no protected areas in are near vicinity. The report did reveal a federal conservation easement that is 293 acres to the East of our facility.

After performing an assessment of protected areas within our facilities zone of influence, JW Aluminum has determined there are no protected areas near our facilities.



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Revision History

Rev #	Date	Reason for change
0	02/20/2025	Document Created
1	09/11/2025	Converted to a controlled document