



Supply Base Report:

Granules Combustibles Energex inc. Re-assessment

Sustainable Biomass Program
sbp-cert.org



Completed in accordance with the Supply Base Report Template Version 2.2 and SBP Bridging Requirements for Meeting the Directive EU/2023/2413 (REDIII)

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

Producer name:	Granules Combustibles Energex inc.
Producer address:	3891 Président Kennedy, G6B 3B8 Lac-Mégantic (Québec), Canada
SBP Certificate Code:	SBP-08-39
Geographic position:	45.576620, -70.867290
Primary contact:	Alain Perreault, +1 819 583 5131 X1170, aperreault@lignetics.com
Company website:	https://energex.com
Date report finalised:	05 Mar 2026
SBR reporting period from:	01 Jan 2025
SBR reporting period to:	31 Dec 2025
Name of the Certification Body:	Preferred by Nature OÜ
Certification Body Approval date:	20 Mar 2026
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	Canada (South Central Quebec, South East Ontario,), United States (NY, VT, NH, ME, RI, MA, PA, CT)
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards

2 Description of the Biomass Producer and the Supply Base

2.1 Description of the company

The main plant in Lac-Mégantic was built by the oil company Shell in 1982, in response to the energy crisis of the 1970s. Designed to serve the industrial bulk market of the eastern United States, it operated under the Shell banner until 1993, when it became part of Lignetics. For over 30 years, Lignetics has transformed wood waste into premium, eco-friendly, diverse products, with heating pellets being our flagship offering.

Products included in the scope of SBP Certification: WB 1.1 Wood pellets

Number of employees: 43

Annual maximum production capacity (metric tonnes): 110000

Number of direct feedstock suppliers: 1

Approximate number of feedstock sub-suppliers: 39

Description of the chain-of-custody and upstream supply chain:

Energex sources its feedstock through one broker. A total of 30 mills delivered residues during the reference period of the audit. The majority of those supplying mills are first processing mills which some have second and third manufacturing capabilities. In Quebec, 8 out of 13 marketing boards are part of the BP's supply chain. On private woodlots, contractors and woodlot owners conduct harvest operations. All must comply with municipal by-laws and provincial regulations to market tree logs. On public land, under the supervision of the Ministry of Natural Resources and Forest, contractors and mills are responsible of harvesting in compliance with laws and regulations of the province. Energex considers the Marketing Boards and the MNRF as operators up their supply chain (9 sub suppliers).

2.2 Detailed description of the Supply Base

Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.

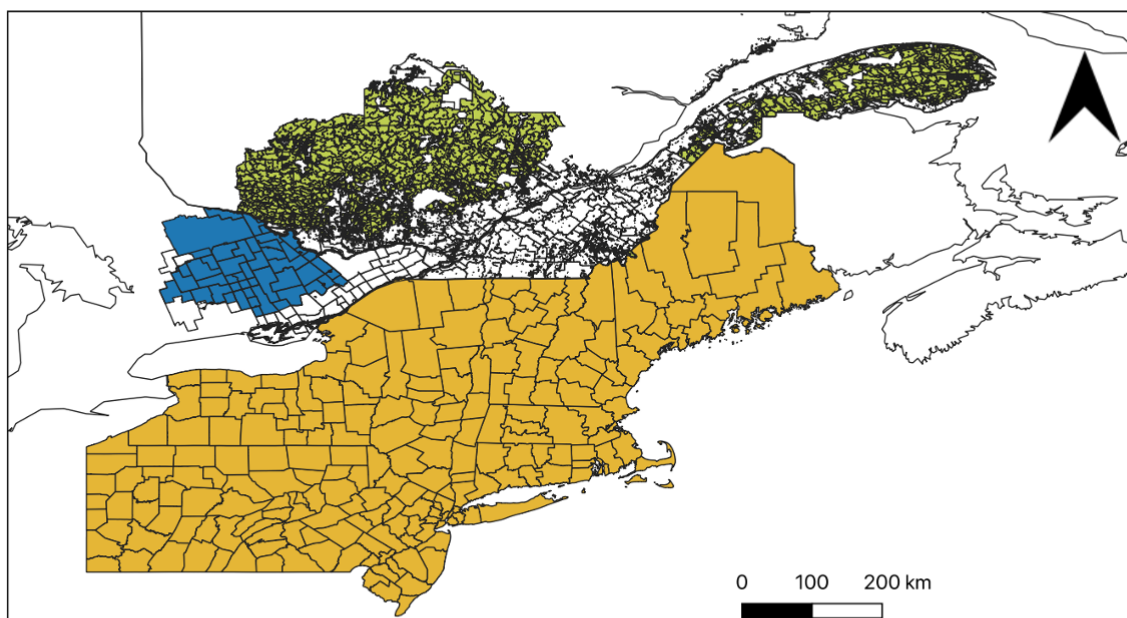
Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.

Annex 2 is generated if EU RED SBE is in the scope for each country separately.

Country	Canada
Area/Region	South Central Quebec, South East Ontario,
Exclusions	-
Feedstock types	Processing residues ¹
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	No

For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used, N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
Provide a concise summary of why a SBE was determined to be required or not required here:	
All of Energex's feedstock is residues from processing facilities either FSC Mix Credit (i.e. SBP Red Compliant Biomass) or FSC Controlled Wood (i.e. SBP RED Controlled Sources). The SBE is for feedstock sourced from the province of Quebec which is covered by the SBP Quebec interim RRA. Implementing mitigation measures for specified risks identified by the RRA will allow Energex to increase its output of SBP Compliant Biomass.	
Feedstock types included in SBE:	Processing residues ¹
Includes EU RED SBE:	No
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	32.7600
Map(s) of the Supply Base area:	

Combustibles Granules Energex inc. Supply Base Map 2025



Canada	Ontario
Canada	OntarioPrivate
Québec	Ontario FM
Qc Private Tenure	United States
Public forests Quebec 2025	States part of Energex Supply Base 2025

Country	United States
Area/Region	NY, VT, NH, ME, RI, MA, PA, CT
Exclusions	-
Feedstock types	Processing residues ¹
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	No
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme

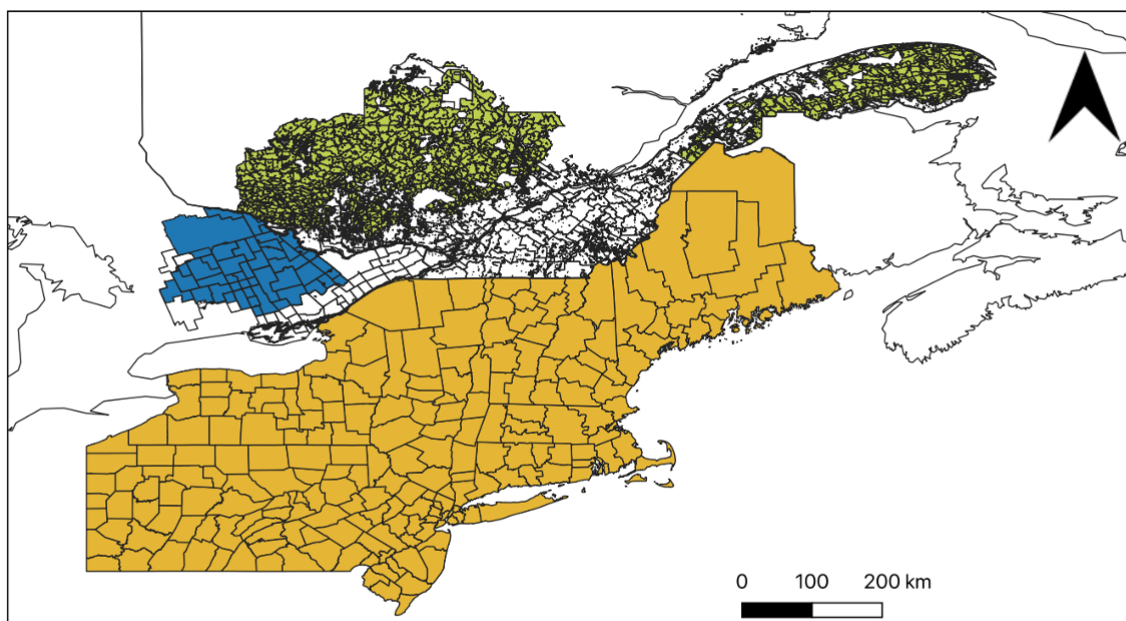
Provide a concise summary of why a SBE was determined to be required or not required here:

Feedstock sourced from US based mills is received with FSC Controlled Wood claim.

Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	46.9900

Map(s) of the Supply Base area:

**Combustibles Granules Energex inc.
Supply Base Map 2025**



Canada	Ontario
Canada	OntarioPrivate
Québec	Ontario FM
Qc Private Tenure	United States
Public forests Quebec 2025	States part of Energex Supply Base 2025

2.3 Feedstock information

a. Total volume of Feedstock: 1-200,000 tonnes

b. Volume of primary feedstock: 0

c. List of all the species in primary feedstock, including scientific name:

Betula papyrifera	White Birch
Quercus alba	White Oak
Quercus rubra	Red Oak
Acer rubrum	Red maple
Acer saccharum	Hard Maple
Populus tremuloides	Trembling Aspen
Pinus strobus	White Pine
Picea glauca	White Spruce
Picea mariana	Black Spruce
Picea rubens	Red Spruce
Abies balsamea	Balsam Fir
Tsuga canadensis	Eastern Hemlock

d. Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation? N/A

Explanation: Energex feedstock is residues as defined by RED and sourced from sawmills which use high quality timber.

e. Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%): 12.00

f. Softwood (i.e. coniferous trees): specify proportion of feedstock from (%): 88.00

g. Proportion of feedstock composed of or derived from saw logs by weight (%): 0.00

h. Indicate how you determine the proportion of saw log: Specification used by the sawmill closest to where the wood was grown.

i. Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%): 100.00

j. Select forest type(s) where the primary feedstock was sourced from: Other Naturally Regenerated Forest

k. Select the main harvesting system(s) used for the sourced primary feedstock: Mix of the above

l. Volume of primary feedstock from primary forest:

m. Volume of processing residues feedstock: 1-200,000 tonnes

Physical form of the feedstock: Chips, Sawdust, Other (specify)

n. Share of SBP-recognised system claim for processing residues:

100 % FSC

o. Volume of post-consumer feedstock: 0

Physical form of the feedstock: Chips, Sawdust, Other (specify)

p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP: 100 %

q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated): 1000000.00 m3

Explanation: More than 30million m3 of primary feedstock can be harvested in the province of Quebec. A fraction is sourced as primary feedstock by biomass producers. More than 36 mills generating energy of which 13 are pellet producers exist in Quebec.

3 Supply Base Risk Assessments and Risk Management Measures

Guidance: Biomass Producers shall demonstrate that any specified risks of sourcing feedstock not in compliance with SBP Standard 1 have been adequately reduced to low risk, following Standard 2 requirements. Following section applies to Biomass Producer's implementing SBP Supply Base Evaluation (SBP RRA or company own risk assessment). EU RED Supply Base Evaluation details are reported in Annex 2.

☐ **Not Applicable – Supply Base Evaluation not implemented**

3.1 Summary of the Supply Base Evaluation

All of Energex's feedstock is residues from processing facilities either FSC Mix Credit (i.e. SBP Red Compliant Biomass) or FSC Controlled Wood (i.e. SBP RED Controlled Sources). The SBE is for feedstock sourced from the province of Quebec which is covered by the SBP Quebec interim RRA. Implementing mitigation measures for specified risks identified by the RRA will allow Energex to increase its output of SBP Red Compliant Biomass.

A 30 day public consultation from February 3 until March 4 2026 of identified stakeholders was conducted by Energex. Their suppliers, private woodlot associations and forest contractor member organizations were invited to share their comments on the proposed mitigation measures and monitoring.

3.2 Conflicts with applicable national and sub-national legislation

n/a

3.3 Risk Management Measures

Guidance: Please provide more details about specified risk indicators in each supply country and describe mitigation measures taken to address all specified risks associated with indicators.

Country: Canada	
Area/sub-scope: Private forests, Quebec	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☒ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment

Indicator with specified risk:
1.1.1 Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Description of the specific risk:
Compliance with all laws and regulations could not be confirmed at the provincial level due to the absence of professional supervision for forest activities undertaken without the use of assistance programs for private woodlots.
Mitigation measure:
The annual reports of regional forest agencies, as well as marketing boards, confirm a sustained level of outreach efforts promoting sustainable forest management best practices among private woodlot owners, notably through training activities on sound forestry practices (e.g., legal compliance, maintenance of forest cover/site regeneration, identification/maintenance/restoration of biodiversity and HCVs, and protection of soils and aquatic environments).
Monitoring and outcomes:
In collaboration with Marketing Boards, Energex reviews defined documentation (annual reports, training records, workshops, projects) to assess the level of outreach to private woodlot owners and contractors. Results of the documentation review annual reports confirm their monitoring and training activities by both regional agencies and marketing boards and that overall the level of outreach is sustained. The consultation identified ways to improve information sharing with Marketing Boards. On-going discussions highlights opportunities for some Marketing Boards to collect additional data to confirm outreach of BMPs to woodlot owners.

Country: Canada
Area/sub-scope: Private forests, Quebec
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☒ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment

Indicator with specified risk:	
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	
Description of the specific risk:	
The regional risk analysis for the province of Quebec concludes that it is not able to confirm that the main biodiversity-related characteristics of Indicator 2.1.1 are identified within the organization's supply area for harvesting activities carried out without the private forest development program.	
Mitigation measure:	
The annual reports of regional forest agencies, as well as marketing boards, confirm a sustained level of outreach efforts promoting sustainable forest management best practices among private woodlot owners, notably through training activities on sound forestry practices (e.g., legal compliance, maintenance of forest cover/site regeneration, identification/maintenance/restoration of biodiversity and HCVs, and protection of soils and aquatic environments).	
Monitoring and outcomes:	
In collaboration with Marketing Boards, Energex reviews defined documentation (annual reports, training records, workshops, projects) to assess the level of outreach to private woodlot owners and contractors.	
A thorough review annual reports and communication methods used to inform landowners, agencies and Marketing Boards monitor the implementation of their annual planning. Some agencies provide detailed descriptions of their planned activities for the upcoming year. While the content of agency annual reports tend to be more standardized, those of the Marketing Boards are not, making their analysis more complex.	
The main trends observed in the annual reports include:	
* Widespread exceeding of silvicultural work targets * Strong commitment of private forest landowners * Diversification of multi-resource projects * Increasing integration of climate change considerations * Strengthened knowledge transfer * An integrated forest–wildlife–biodiversity approach	

Country: Canada	
Area/sub-scope: Private forests, Quebec	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed

	☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☒ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.	
Description of the specific risk:	
The regional risk analysis for the province of Quebec concludes that it is not able to confirm whether the impacts of harvesting activities carried out outside the private forest development program on the main biodiversity-related characteristics of Indicator 2.1.1 are known.	
Mitigation measure:	
The annual reports of regional forest agencies, as well as marketing boards, confirm a sustained level of outreach efforts promoting sustainable forest management best practices among private woodlot owners, notably through training activities on sound forestry practices (e.g., legal compliance, maintenance of forest cover/site regeneration, identification/maintenance/restoration of biodiversity and HCVs, and protection of soils and aquatic environments).	
Monitoring and outcomes:	
In collaboration with Marketing Boards, Energex reviews defined documentation (annual reports, training records, workshops, projects) to assess the level of outreach to private woodlot owners and contractors. A thorough review annual reports and the communication methods used to inform landowners, all agencies and Marketing Boards monitor the implementation of their annual planning. Some agencies provide detailed descriptions of their planned activities for the upcoming year. While the content of agency annual reports tends to be more standardized, those of the Marketing Boards are not, making their analysis more complex. The main trends observed in the annual reports of agencies and Marketing Boards include: * Widespread exceeding of silvicultural work targets * Strong commitment of private forest landowners * Diversification of multi-resource projects * Increasing integration of climate change considerations * Strengthened knowledge transfer * An integrated forest–wildlife–biodiversity approach	

Country: Canada
Area/sub-scope: Private forests, Quebec

Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☒ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
The regional risk analysis for the province of Quebec concludes that it is not able to confirm whether key biodiversity features and HCV areas are being maintained or enhanced within the supply zones.	
Mitigation measure:	
The forest landowners met and/or the activities visited demonstrate an appropriate understanding of sound forestry practices, particularly with respect to legal compliance, maintenance of forest cover/site regeneration, identification/maintenance/restoration of biodiversity and HCVs, and the protection of soils and aquatic environments.	
Monitoring and outcomes:	
In collaboration with Marketing Boards, Energex reviews defined documentation (annual reports, training records, workshops, projects) to assess the level of outreach to private woodlot owners and contractors. Field visits show the implementation of best forest management practices.	

Country: Canada	
Area/sub-scope: Private forests, Quebec	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim

	☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☒ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced	
Description of the specific risk:	
The regional risk analysis for the province of Quebec concludes that it is not able to confirm the maintenance or improvement of soil quality within the supply zones of harvesting activities carried out outside the private forest development program.	
Mitigation measure:	
The annual reports of regional forest agencies, as well as marketing boards, confirm a sustained level of outreach efforts promoting sustainable forest management best practices among private woodlot owners, notably through training activities on sound forestry practices (e.g., legal compliance, maintenance of forest cover/site regeneration, identification/maintenance/restoration of biodiversity and HCVs, and protection of soils and aquatic environments). The field visits confirm the maintenance of forest cover/site regeneration, the identification/maintenance/restoration of biodiversity and HCVs, as well as the protection of soils, riparian zones and water resources.	
Monitoring and outcomes:	
In collaboration with Marketing Boards, Energex reviews defined documentation (annual reports, training records, workshops, projects) to assess the level of outreach to private woodlot owners and contractors. The annual reports of regional forest agencies, as well as marketing boards, confirm a sustained level of outreach efforts promoting sustainable forest management best practices among private woodlot owners, notably through training activities on sound forestry practices (e.g., legal compliance, maintenance of forest cover/site regeneration, identification/maintenance/restoration of biodiversity and HCVs, and protection of soils and aquatic environments). Field visits confirm the maintenance of forest cover/site regeneration, the identification/maintenance/restoration of biodiversity and HCVs, as well as the protection of soils, riparian zones and water resources.	

Country: Canada
Area/sub-scope: Private forests, Quebec

Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☒ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.4 Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.	
Description of the specific risk:	
The regional risk analysis for the province of Quebec concludes that it is not able to confirm whether the harvesting of logging residues and/or stumps in private forests causes negative or irreversible impacts on forest ecosystems.	
Mitigation measure:	
The wood fibre does not originate from sensitive sites to nutrient loss or recognized as low-productivity sites. Furthermore, the organization does not source residues derived from forest harvesting operations.	
Monitoring and outcomes:	
With supplier contracts and feedstock analyses at time of reception, the BP confirms it does source feedstock from the collection of harvest residues. See list of suppliers with contracts, commitments and declarations. Records of feedstock lab tests.	

Country: Canada	
Area/sub-scope: Private forests, Quebec	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed

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Indicator with specified risk:	
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.	
Description of the specific risk:	
The regional risk analysis for the province of Quebec concludes that it is not able to confirm the quality and quantity of groundwater, surface water, and downstream water are maintained or improved in the supply zones for activities outside the private forest development program.	
Mitigation measure:	
The annual reports of regional forest agencies, as well as marketing boards, confirm a sustained level of outreach efforts promoting sustainable forest management best practices among private woodlot owners, notably through training activities on sound forestry practices (e.g., legal compliance, maintenance of forest cover/site regeneration, identification/maintenance/restoration of biodiversity and HCVs, and protection of soils and aquatic environments). The field visits confirm the maintenance of forest cover/site regeneration, the identification/maintenance/restoration of biodiversity and HCVs, as well as the protection of soils, riparian zones and water resources.	
Monitoring and outcomes:	
In collaboration with Marketing Boards, Energex reviews defined documentation (annual reports, training records, workshops, projects) to assess the level of outreach to private woodlot owners and contractors. Field visits confirm the maintenance of forest cover/site regeneration, the identification/maintenance/restoration of biodiversity and HCVs, as well as the protection of soils, riparian zones and water resources.	

Country: Canada	
Area/sub-scope: Private forests, Quebec	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed

	☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☒ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.10 Harvested areas shall be regenerated	
Description of the specific risk:	
There is no public database to validate the regeneration of stands after final felling carried out without recourse to management aid programs. Consequently, the risk is Specified.	
Mitigation measure:	
The annual reports of regional forest agencies, as well as marketing boards, confirm a sustained level of outreach efforts promoting sustainable forest management best practices among private woodlot owners, notably through training activities on sound forestry practices (e.g., legal compliance, maintenance of forest cover/site regeneration, identification/maintenance/restoration of biodiversity and HCVs, and protection of soils and aquatic environments). The field visits confirm the maintenance of forest cover/site regeneration, the identification/maintenance/restoration of biodiversity and HCVs, as well as the protection of soils, riparian zones and water resources.	
Monitoring and outcomes:	
In collaboration with Marketing Boards, Energex reviews defined documentation (annual reports, training records, workshops, projects) to assess the level of outreach to private woodlot owners and contractors. Field visits confirm the maintenance of forest cover/site regeneration, the identification/maintenance/restoration of biodiversity and HCVs, as well as the protection of soils, riparian zones and water resources.	

Country: Canada	
Area/sub-scope: Quebec	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim

	☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☒ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.2.2 Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.	
Description of the specific risk:	
The regional risk assessment for the province of Quebec concludes that it is not able to confirm that impacts are minimized on sites sensitive to nutrient loss and unproductive for harvesting activities carried out outside the private forest development program.	
Mitigation measure:	
The organization does not source Category 1 (i.e., primary) raw materials.	
Monitoring and outcomes:	
Maintain up-to-date supplier listing with contracts and feedstock specification. Archive supplier declarations and commitments as well as documented supplier mill visits.	
No primary feedstock delivered to the mill during the referenced audit period.	

Country: Canada	
Area/sub-scope: Public Forest Quebec	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☒ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim

	☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
The federal recovery plan for the boreal caribou aims to reduce the rate of disturbance to its habitat and targets the maintenance and restoration of large forest areas important for the boreal caribou.	
Mitigation measure:	
Energex's non-certified feedstock is not sourced from the habitat of the boreal caribou neither from Intact Forest Landscapes, according to supplier declarations and traceability tools.	
Monitoring and outcomes:	
All feedstock is delivered with either the FSC Controlled Wood or FSC Mix claim. No uncertified material sourced.	

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 03 Feb 2026

Biomass Producer's stakeholder engagement end date: 04 Mar 2026

Total number of stakeholders contacted: 34

Give a general description of the process of Stakeholders Engagement, including stakeholders contacted, method of communication and a summary of the comments received:

Emails and phone interviews were used to collect and to exchange with identified stakeholders. An email notification was sent out to private and to organizational emails. Follow-up communications and notifications occurred through out the consultation period. A summary of comments and finalized mitigation measure process will be shared with identified stakeholders following the consultation.

4.2 Response to stakeholder comments

Stakeholder description: Marketing Board representative

Stakeholder comment: Harvest on private woodlots occur in populated areas where inappropriate activities are reported to the proper authorities. Operations may not be supervised, it should not automatically be considered non compliant. // Percentage of marketed logs by woodlot owner organizations does not necessarily mean harvest operations were supervised. // Final cuts should only represent 5-10% in Centre-du-Québec region. In Lanaudière, between 0 and 5% and in Mauricie, between 10 and 15% excluding the large private woodlots.

Response to the stakeholder: Thank you for your comments. As mentioned, it is the lack of evidence that determine the specified risk not the fact that operations are unsupervised. We will contact regional agencies to collect more precise information on proportions of final vs partial cuts.

Stakeholder description: Marketing Board Representative

Stakeholder comment: In our region, a very high percentage of harvests benefit from professional supervision (during an/or after harvests). The great majority of harvests are partial cuts. Most if not all measures proposed by Energex are already implemented. We are committed in supporting organizations with voluntary and regulated market requirements.

Response to the stakeholder: Thank you for your comments and documentation. Could you provide us more information about the proportion of activities undertaken under professional supervision as well as the proportion of final cuts vs partial cuts.

Stakeholder description: Marketing Board Representative

Stakeholder comment: We are open to analyze the opportunity to improve the collection and sharing of data in support to the forest industry's efforts to comply with voluntary and regulated markets.

Response to the stakeholder: Thank you for your comments. we will pursue the opportunity to improve our collaboration to implement and to monitor our mitigation measures. The documents provided is very helpful. We will engage with you and other marketing boards in the next months to continue the improvement of our risk management measures.

Stakeholder description: Marketing Board Representative

Stakeholder comment: Our organization does not conduct field visits of harvest operations. We can certainly look at how we can improve sharing our information with Energex. We plan to begin field visits to monitor log transportation. With financial support, we could analyze the possibility to record on-site inspections of harvesting.

Response to the stakeholder: We thank you for your comments. We observe a wide range of monitoring intensity by Marketing Boards in our supply base. One of our objectives is to define and to implement measures in collaboration with private woodlot stakeholders to document harvest practices and to improve data sharing among them.

Stakeholder description: Biomass Producer

Stakeholder comment: As we source only processing residues and do not play an active role in forest management, we approve the mitigation measures and suggested improvements.

Response to the stakeholder: Thank you for your comments.

5 Report updates and approval

This document is: New Supply Base Report (Assessments/reassessments)

Summary of changes: N/A

Name	Nicolas Blanchette
Title	Consultant
Date of report approval	05 Mar 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

Annex 2: EU RED Supply Base Evaluation

Not Applicable (RED II SBE not included)

Annex 2a: EU RED II Supply Base Evaluation

Annex 3: SBP Processing residues and/or Post-consumer feedstock requirements

☐ Not Applicable (Processing Residues and/or post-consumer feedstock not used)

Verification and monitoring of suppliers

The mill has a long standing relationship with its suppliers. Energex mandates a panel manufacturer to secure its feedstock needs and particularities. Information and commitments are collected and renewed on an annual basis from suppliers. All suppliers are 1st and 2nd processing facilities.

Feedstock inspection and classification upon receipt

The quality manager:

- a) Checks the quality of each delivery.- A sample of the delivery is bagged and analyzed.- Samples, analyzes are archived and available for verification by the Registrar.
- b) Completes the non-compliance sheet when:- The quality or type of raw material does not meet the expectations of the organization- If it is impossible to confirm at the time of receipt the category of the material delivered, the material will not be accepted otherwise an on-site audit of the supplier will be undertaken.

Supplier audit for processing residues and post-consumer feedstock

Audit procedures

Audit of secondary and tertiary material suppliers.

- Intermediaries who do not take possession of the material can be assessed remotely.
- The audit may be carried out by a subcontractor.
- The organization will justify the intensity of its audits of these suppliers.
- a sample of sawdust and shaving suppliers are carried out, none for suppliers of secondary processing.
- for suppliers of primary wood chips, in preparation for the internal audit, ensure that suppliers have been visited and sampled according to the following criteria (**NON APPLICABLE - NO PRIMARY FEEDSTOCK SUPPLIERS**):
 - they are active suppliers of primary roundwood chips;
 - sample at least x suppliers according to the formula 0.6 square root of the number of suppliers selected;
 - prioritize the most important suppliers.
 - If suppliers refuse to visit their facilities, they will no longer be able to deliver raw material to Energex.
- Plant visits will evaluate the following criteria:
 - Raw materials in the plants
 - Presence or absence of machinery for roundwood chipping
 - Whether the supplier has chipped roundwood, and if so, why;
- Where applicable, if the auditor notes the possibility of non-compliance with RED by-product definitions, the following elements of the supplier will be examined:
 - Procedures/instructions implemented to control and classify secondary or tertiary material
 - Training given to personnel to carry out this control and classification
 - Records confirming the origin of the material.
 - Audits should be documented, specifying the date they were carried out, the observations, names and qualifications of the auditors, and examples of evidence confirming the classification of the material.
 - If it is demonstrated that the supplier has generated and delivered by-products to Energex that do not respect their RED commitment, i.e. that they have modified their production process with the deliberate aim of producing roundwood chips, Energex will stop all deliveries from this supplier. Deliveries may only be resumed if the supplier has first demonstrated how it will comply with the EU REDIII processing residues definition.

Annex 4: EU RED detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no EU RED sustainability requirements apply, only the GHG savings criteria apply (SBP EU RED Bridging ID v2.0 Section 1.1). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).

Not Applicable (RED II TOF not included)

Annex 4a: RED II detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no REDII sustainability requirements apply, only the GHG savings criteria apply (SBP REDII Bridging ID Section 4.2). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).