



Supply Base Report:

Woodville Pellets, LLC Second Surveillance Audit

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:	Woodville Pellets, LLC
Producer address:	164 Country Road 1040, 75979 Woodville, United States
SBP Certificate Code:	SBP-04-40
Geographic position:	30.743800, -94.433100
Primary contact:	Mihkel Jugaste, +372 669 9870 or +372 551 9000, mihkel.jugaste@graanulinvest.com
Company website:	
Date report finalised:	05 Sep 2025
SBR reporting period from:	01 Jul 2024
SBR reporting period to:	30 Jun 2025
Name of the Certification Body:	SCS Global Services
Certification Body Approval date:	08 Oct 2025
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)	United States (Texas + Louisiana)
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

Woodville Pellets, LLC (WP) operates a pellet mill located in the town of Woodville, Texas. The pellet plant is located on a brownfield site formerly used for a chip mill operation. The plant will produce approximately 500,000 metric tons of pellets, which are transported by truck to be loaded onto ships at ports on the Gulf of Mexico. WP has a contract with NAPCO to conduct all direct procurement activities. NAPCO purchases roundwood directly from landowners for delivery into the pellet plant. NAPCO also executes contracts with gatewood suppliers and with area sawmills for the delivery of residual chips and sawdust. NAPCO is in possession of PEFC Chain of Custody certification, to enable the company to pass along valid certification claims to WP, where applicable.

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

Number of employees: 76

Annual maximum production capacity (metric tonnes): 500000

Number of direct feedstock suppliers: 1

Approximate number of feedstock sub-suppliers: 5

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

Woodville is situated in East Texas, in relative proximity to both the Gulf of Texas and the state line with Louisiana, in a rural area with both agriculture and forestry present on the local landscape. The mill has a name-plate capacity of 500,000 metric tons per annum. Woodville is located in a region with a tradition of an active forest products industry, and in addition to primary sources of raw material (i.e. forest harvesting), there are secondary sources of fiber available to the mill, such as sawmill residuals. WP has determined its Supply Base to be a 150-mile radius from its Woodville facility, within Texas and Louisiana. The radius is an estimate resulting from discussions with (past and present) secondary suppliers over maximum economic distance for hauling wood to their mills. A list of counties in Texas and parishes in Louisiana is attached. This represents a conservative estimated geography of sourcing for WP. However, sourcing varies annually and the core sourcing region is concentrated to a smaller cluster of east Texas counties surrounding the facility. North American Procurement Company, or 'NAPCO' is a core procurement partner. NAPCO sources primary material based either on the purchase of timber on the stump (with harvesting managed and/or contracted by NAPCO), or as volume offered for purchase as part of the off-take of a harvesting operation managed by another entity. In either scenario, the fiber consists of small-diameter and/or low-quality product, whether roundwood or residual material. The key point is that merchandising of wood products typically means that higher quality (and or larger diameter) wood is forwarded to saw-mills or other facilities, with lesser volumes of lower quality material from the harvest ending up at the pellet mill.

2.2 Detailed description of the Supply Base

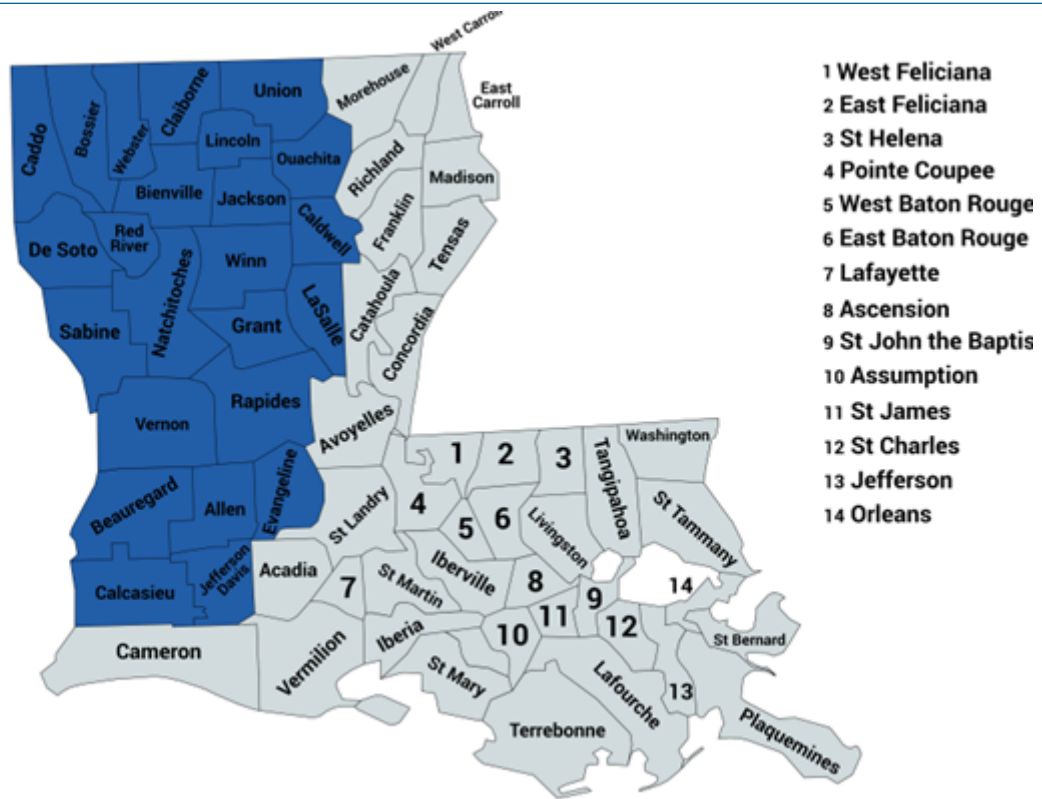
Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.

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.

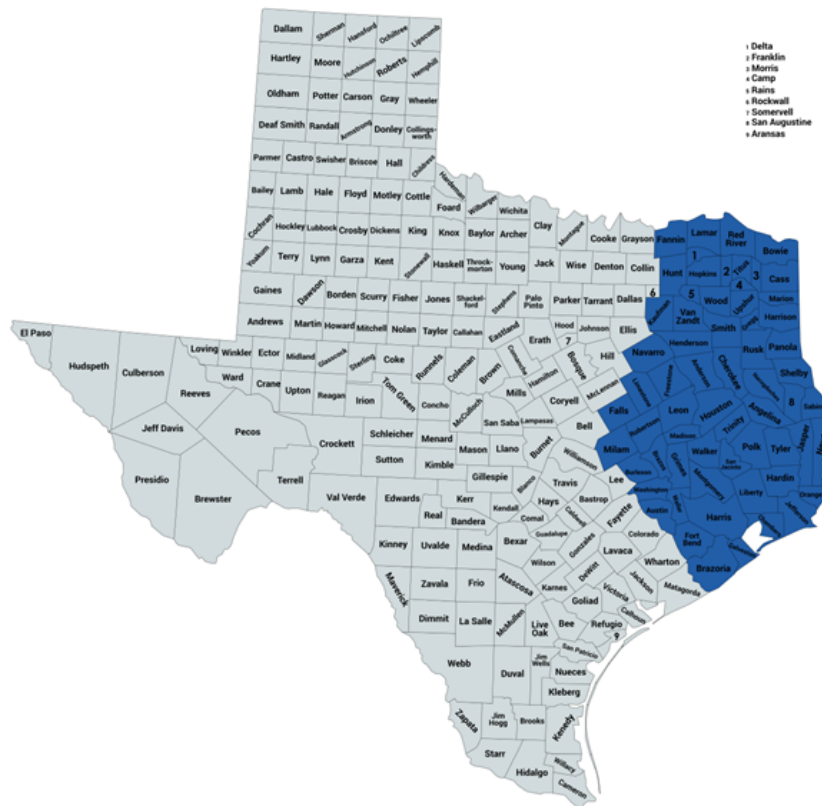
Annex 2 is generated if EU RED SBE is in the scope for each country separately.

Country	United States
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Area/Region	Texas + Louisiana
Exclusions	None
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Minority
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
Provide a concise summary of why a SBE was determined to be required or not required here:	
Woodville Pellets' supply basin is completely encompassed by the RRAs, including both NFS and Private Lands, from which the mill receives the majority of its feedstock.	
Feedstock types included in SBE:	Primary feedstock, Processing residues
Includes EU RED SBE:	Yes
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):	12.7000
Map(s) of the Supply Base area:	



Created with mapbox.com



Created with mapchart.net

2.3 Feedstock information

- a. **Total volume of Feedstock:** 600,000-800,000 tonnes
- b. **Volume of primary feedstock:** 600,000-800,000 tonnes
- c. **List of all the species in primary feedstock, including scientific name:**

Pinus taeda	Loblolly Pine
Pinus palustris	Longleaf Pine
Pinus echinata	Shortleaf Pine
Pinus elliottii	Slash Pine
Quercus spp	Oak
Liquidambar styraciflua	Hickory
Carya spp	Sweetgum
Acer rubrum	Red Maple

- d. **Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation?** Yes - Minority
Explanation: While precise volumes are not available, salvage harvesting and control measures are a very important form of forest management in this region with ongoing extreme weather events, along pest and invasive species outbreaks. This region experiences regular windthrow from hurricanes, along with beetle and other invasive pests.
- e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 0.00
- f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 100.00
- 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 (%):** 0.00
- j. **Select forest type(s) where the primary feedstock was sourced from:** Planted Forest
- k. **Select the main harvesting system(s) used for the sourced primary feedstock:** Thinning
- l. **Volume of primary feedstock from primary forest:** 0
- m. **Volume of processing residues feedstock:** 200,000-400,000 tonnes
Physical form of the feedstock: Sawdust, Offcuts
- n. **Share of SBP-recognised system claim for processing residues:**
- o. **Volume of post-consumer feedstock:** 0
Physical form of the feedstock: Sawdust, Offcuts
- 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):** 31998.04 m³
Explanation: It is unclear what this number could be, given the dynamics in the forests base. But, the estimate taken from USDA reports is 1.13 cubic feet annually for all species of growth.

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

3.1, 3.2, 3.3 Woodville Pellets sources uncertified feedstock, using the SBP-endorsed RRA (Interim, March 2025) and Risk Management for species risks for SBP-compliant claims. All Woodville Pellets' input feedstock is eligible for an SBP-compliant claim. The company does not intend to make SBP-controlled claims.

Feedstock category Certification Status Standard 2 Conformance Requirements

Primary	Not certified to an SBP-benchmarked certification scheme	RRA + Risk Management for specified risks*
Processing residues	Not certified to an SBP-benchmarked certification scheme	RRA + Risk Management for specified risks*
Post-consumer	Not applicable	Evidence to prove 'post- consumer' feedstock category

3.4 There are no known conflicts between the requirements of Standard 1 and applicable legislation (national and sub-national) in the Supply Base. See RRA for more information.

3.5 RRAs have been developed for National Forests where all indicators are low risk and Private Lands, encompassing State, Local and other ownerships, that specifies risks. The Private Lands RRA, including specified risk mitigation measures, is, therefore, used consistently regardless of ownership class of origin, certification status or other factors.

3.6 Woodville Pellets monitors its supply base sourcing area, supply chains and governance conditions to ensure adequate geographic coverage by applicable SBP-endorsed RRAs.

3.7 and 3.8 Woodville Pellets has established criteria for selecting and appointing an entity or individual(s) with the required competences to undertake SBE and RRA related functions. Competencies should be supported by relevant and appropriate training, education, skills and experience. At a minimum, education and / or professional work experience in a relevant discipline and appropriate to scale and intensity within the Supply Base area, including but not limited to: geographic scope, natural resource management (landscape level ecosystems, ecology, natural sciences, forest practices); knowledge and experience in land use criteria (ecology, natural science, forestry, silviculture, social science or similar); Due Diligence Systems (DDSs) and Risk Assessment processes; legislative requirements, SBP requirements, labor, cultural and social norms; CoC Cert systems; knowledge of local industry and sector best practice; engagement and public relations.

3.9, 3.10, 3.11 Woodville Pellets' risk assessment process aligns under the SBP-endorsed RRAs.

3.2 Conflicts with applicable national and sub-national legislation

None.

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: United States	
Area/sub-scope: Texas + Louisiana	
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 Interim Regional Risk Assessment for US Private Forest v1.0 (March 6, 2025) identified risk for this indicator. The Endangered Species Act (ESA) is a highly efficient system for the maintenance and enhancement of Federally listed threatened and endangered animal species. However, there is a lack of regulatory safeguards and/or resources/incentives for maintenance and enhancement of G1-G2 animal species not addressed by ESA and G1-G2 plant species identified by the Nature Serve Network and 2019 FSC US NRA identified species, ecosystems, and HCVs.	
Mitigation measure:	
Woodville's overall approach aligns with measures specified in the Interim Regional Risk Assessment for US Private Forest v1.0 (March 6, 2025). These include the following measures which are in stages of implementation, given the recent release and pending final approval with potential revision to the RRAs. Woodville Pellets leverages an array of mechanisms including the company's contractual provisions and its own PEFC CoC program, along with State Logger Programs and the SFI Fiber Sourcing Programs of its suppliers. These include: - Assessment of G1 and G2 plant and animal species and ecosystems as well as FSC US NRA specified HCVs, by forest type within a biomass producer's supply basin, including primary and processing residue feedstocks: a. Results are integrated into a summary of management recommendations to support maintenance or	

enhancement of identified G1 and G2 species and HCVs associated with forest types within the supply basin.

b. Results, including forest type-based management recommendations, are in the process of integration into logger training curricula for company level or coordinated delivery to loggers within the supply region, which are required by contract for all suppliers to Woodville.

c. We require our suppliers to enter binding written agreements that specify logger training inclusive of forest type-based management recommendations to maintain or enhance G1 and G2 species and HCVs.

Monitoring and outcomes:

The RRAs for the US remain in interim status and, thus, are subject to change with the approval of the SBP governance structure. Irrespective of this situation, the company maintains a robust internal audit program that rigorously monitors contract provisions and mitigation implementation. Additionally, the supplier audit program verifies implementation of mitigation measures, along with review of certification credentials that may fulfill or bolster these efforts. This may also include tract visits for both roundwood and residual suppliers, based on risk profiles and other considerations.

Country: United States

Area/sub-scope: Texas + Louisiana

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:

2.2.1 Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.

Description of the specific risk:

While there is consensus that deforestation rates are quite low in the US and for the southern US, analysis of FIA for the given time period indicates net loss of timberland for the RRA geography of less than 1% (0.75%) with localized losses and gains. Similarly, using methodology based on population growth and issuance of housing permits, which is not based on change detection analysis of the forest itself, the FSC US NRA specified risk for a set of counties within the RRA's geography. Despite relatively low rates of forest

loss, with recognition to the precedence of the FSC US NRA and the results of original analysis for the RRA's geography, risk is specified as it relates to forests in this Indicator.

Mitigation measure:

To mitigate risk of sourcing feedstock from areas of forest converted to other land uses, WOODVILLE PELLETS implements control measures consistent with those identified in the FSC US NRA (2019). Specifically, the company has developed and implemented binding written agreements with suppliers that prohibit the delivery of material originating from known conversions of forest to nonforest use.

Monitoring and outcomes:

The RRAs for the US remain in interim status and, thus, are subject to change with the approval of the SBP governance structure. Irrespective of this situation, WOODVILLE PELLETS maintains a robust internal audit program that rigorously monitors contract provisions and mitigation implementation, consistent with RRA specified mitigations. Additionally, our supplier audit program verifies implementation of mitigation measures, along with review of certification credentials that may fulfill or bolster these efforts. This may also include tract visits for both roundwood and residual suppliers, based on risk profiles and other considerations.

Country: United States

Area/sub-scope: Texas and Louisiana

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:

2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.

Description of the specific risk:

The Interim Regional Risk Assessment for US Private Forest v1.0 (March 6, 2025) identified risk for this indicator. The Endangered Species Act (ESA) is a highly efficient system for the maintenance and enhancement of Federally listed threatened and endangered animal species. However, there is a lack of regulatory safeguards and/or resources/incentives for maintenance and enhancement of G1-G2 animal

species not addressed by ESA and G1-G2 plant species identified by the Nature Serve Network and 2019 FSC US NRA identified species, ecosystems, and HCVs.

Mitigation measure:

Woodville's overall approach aligns with measures specified in the Interim Regional Risk Assessment for US Private Forest v1.0 (March 6, 2025). These include the following measures which are in stages of implementation, given the recent release and pending final approval with potential revision to the RRAs. Woodville Pellets leverages an array of mechanisms including the company's contractual provisions and its own PEFC CoC program, along with State Logger Programs and the SFI Fiber Sourcing Programs of its suppliers. These include:

- Assessment of G1 and G2 plant and animal species and ecosystems as well as FSC US NRA specified HCVs, by forest type within a biomass producer's supply basin, including primary and processing residue feedstocks:
 - a. Results are integrated into a summary of management recommendations to support maintenance or enhancement of identified G1 and G2 species and HCVs associated with forest types within the supply basin.
 - b. Results, including forest type-based management recommendations, are in the process of integration into logger training curricula for company level or coordinated delivery to loggers within the supply region, which are required by contract for all suppliers to Woodville.
 - c. We require our suppliers to enter binding written agreements that specify logger training inclusive of forest type-based management recommendations to maintain or enhance G1 and G2 species and HCVs.

Monitoring and outcomes:

The RRAs for the US remain in interim status and, thus, are subject to change with the approval of the SBP governance structure. Irrespective of this situation, the company maintains a robust internal audit program that rigorously monitors contract provisions and mitigation implementation. Additionally, the supplier audit program verifies implementation of mitigation measures, along with review of certification credentials that may fulfill or bolster these efforts. This may also include tract visits for both roundwood and residual suppliers, based on risk profiles and other considerations.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 26 Aug 2025

Biomass Producer's stakeholder engagement end date: 26 Sep 2025

Total number of stakeholders contacted: 40

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

Per SEP, Woodville Pellets has developed and implements a robust and multifaceted SEP that is appropriate for their business operations and scope of certification. The SEP is subject to both internal and third-party audits. Evidence of effective implementation of the SEP (such as meeting notes, email communications, records of participation in regional multi-stakeholder processes, responses to comments/feedback/complaints) shall be available for verification.

The SEP is monitored annually and is adapted as necessary to ensure its effectiveness. Evaluation of the plan occurs every five (5) years. The SEP is available, upon request, in a language(s) that is/are accessible for the identified affected stakeholders. Translations may require 4-6 weeks for availability, upon request.

Scope of the SEP The SEP applies to all operations concerning Woodville Pellets' SBP programming including operating sites, business offices and scope of their certificates.

Woodville Pellets' Sustainability team has developed and maintains a stakeholder map (PRN-DP-05). Woodville Pellets engages with its stakeholders each time the SBE is revised and when a certificate is renewed and, in this case, when scope changes from v1 to v2, per direction from SCS. Woodville Pellets allows stakeholders at least one month to provide feedback before the SBE is finalized.

4.2 Response to stakeholder comments

5 Report updates and approval

This document is: Updated SBR (surveillance audits/scope-change audits)

Summary of changes: Supply Base now incorporates the recently published Southeast US Regional Risk Assessment. Stakeholder consultation sent on 8/25/2025 due to SBP v2 revisions.

Name	Elizabeth Denna
Title	Management representative
Date of report approval	05 Sep 2025

Annex 1: Detailed findings for Supply Base Evaluation indicators

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	United States
Area	Texas + Louisiana
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-US-PF-FOR_v1.0 REDIII Level A for US Private FOR
Level B management system at the level of the forest sourcing area	N/A
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-US-PF-FOR_v1.0 REDIII Level A for US Private FOR
Level B management system at the level of the forest sourcing area	N/A
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-US-PF-FOR_v1.0 REDIII Level A for US Private FOR
Level B management system at the level of the forest sourcing area	N/A
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-US-PF-FOR_v1.0 REDIII Level A for US Private FOR
Level B management system at the level of the forest sourcing area	N/A
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-US-PF-FOR_v1.0 REDIII Level A for US Private FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-US-PF-FOR_v1.0 REDIII Level A for US Private FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A

Level B management system at the level of the forest sourcing area

The Interim Regional Risk Assessment for US Private Forest v1.0 (March 6, 2025) identified risk for this indicator. The Endangered Species Act (ESA) is a highly efficient system for the maintenance and enhancement of Federally listed threatened and endangered animal species. However, there is a lack of regulatory safeguards and/or resources/incentives for maintenance and enhancement of G1-G2 animal species not addressed by ESA and G1-G2 plant species identified by the Nature Serve Network and 2019 FSC US NRA identified species, ecosystems, and HCVs.

Mitigation measures Woodville's overall approach aligns with measures specified in the Interim Regional Risk Assessment for US Private Forest v1.0 (March 6, 2025). These include the following measures which are in stages of implementation, given the recent release and pending final approval with potential revision to the RRAs. Woodville Pellets leverages an array of mechanisms including the company's contractual provisions and its own PEFC CoC program, along with State Logger Programs and the SFI Fiber Sourcing Programs of its suppliers. These include: - Assessment of G1 and G2 plant and animal species and ecosystems as well as FSC US NRA specified HCVs, by forest type within a biomass producer's supply basin, including primary and processing residue feedstocks: a. Results are integrated into a summary of management recommendations to support maintenance or enhancement of identified G1 and G2 species and HCVs associated with forest types within the supply basin. b. Results, including forest type-based management recommendations, are in the process of integration into logger training curricula for company level or coordinated delivery to loggers within the supply region, which are required by contract for all suppliers to Woodville. c. We require our suppliers to enter binding written agreements that specify logger training inclusive of forest type-based management recommendations to maintain or enhance G1 and G2 species and HCVs. Monitoring and outcomes: The RRAs for the US remain in interim status and, thus, are subject to change with the approval of the SBP governance structure. Irrespective of this situation, the company maintains a robust internal audit program that rigorously monitors contract provisions and mitigation implementation. Additionally, the supplier audit program verifies implementation of mitigation measures, along with review of certification credentials that may fulfill or bolster these efforts. This may also include tract visits for both roundwood and residual suppliers, based on risk profiles and other considerations.

(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

*(d) **highly biodiverse grassland** spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of*

human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-US-PF-FOR_v1.0 REDIII Level A for US Private FOR
Level B management system at the level of the forest sourcing area	N/A

(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

*(e) **heathland** - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).*

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-US-PF-FOR_v1.0 REDIII Level A for US Private FOR
Level B management system at the level of the forest sourcing area	N/A

(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

*(a) **wetlands**, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).*

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-US-PF-FOR_v1.0 REDIII Level A for US Private FOR
Level B management system at the level of the forest sourcing area	N/A

(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under

the same conditions of determination of the status of land specified in those paragraphs.

*Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was **peatland** in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.*

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-US-PF-FOR_v1.0 REDIII Level A for US Private FOR
Level B management system at the level of the forest sourcing area	N/A
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

LULUCF criteria 29(7)

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-endorsed REDII Level A risk assessment for Article 29(7) LULUCF
Level B management system at the level of the forest sourcing area	N/A

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

3.1 Woodville Pellets performs at least annual on-site audit of its suppliers of processing residues and post-consumer feedstock, based on a justified sampling approach. (ID REDIII 5.3.1)

The annual audit sample considers risk factors including volume of fiber received by supplier, geography of sourcing, RRA and or SBE risk ratings and other factors. At least the square root of the total number of suppliers.

3.2 Woodville Pellets may conduct remote supplier audits of traders or sales offices that do not take physical possession of processing residues or post-consumer feedstock, and which do not alter, store or re-package the feedstock. (ID REDIII 5.3.2)

3.3 Woodville Pellets may employ qualified consultants or partners to implement supplier audits. (ID REDIII 5.3.3)

3.4 Woodville Pellets may rely on supplier audits conducted by others. In cases where the supplier selected for sampling sells processing residues or post-consumer feedstock that were previously collected, classified and traded by other companies or sites, the complete supply chain of these feedstock shall be audited back to the point where the categorization as processing residues or post-consumer feedstock can be demonstrated through objective evidence. (ID REDIII 5.3.4)

3.5 Woodville Pellets' supplier audit program evaluates and verifies documents and other evidence related to the quantity, quality and conformance with SBP definitions of processing residues and post-consumer feedstock, including:

- Supplier's instructions or procedures put in place to control and classify the processing residues and/or post-consumer feedstock
- When applicable, training or instructions provided to the supplier's personnel in relation to categorization and control of processing residues and/or post-consumer feedstock
- Evidence establishing feedstock origin (for example photographs, addresses of processing locations, invoices). (ID REDIII 5.3.5)

3.6 Woodville Pellets seeks additional evidence beyond a declaration from the supplier (even if part of the contractual agreement), as proof of origin and feedstock category. (ID REDIII 5.3.6)

3.7 Woodville Pellets documents supplier audits, including a record of audit date, findings, names and qualifications of auditors and examples of evidence concerning categorization of feedstock. (ID REDIII 5.3.7)

- Supplier audit also includes verification of implementation of mitigation, as required by RRAs.

Feedstock inspection and classification upon receipt

2.1 Upon receipt, Woodville Pellets shall visually inspect all processing residues and or post-consumer feedstock and shall confirm their appropriate categorization, as articulated in its CoC procedure.

2.2 For all processing residues and post-consumer feedstock received, Woodville Pellets retains documentary evidence of the delivery and inspections carried out that confirmed that the feedstock complies with SBP definitions, as articulated in its CoC procedure. Different types of may include feedstock samples, pictures, quality analysis reports, invoices, delivery notes and/or shipping documents, depending on the feedstock concerned. (ID REDIII 5.2.1 and 5.2.2)

2.3 In cases where adequate evidence for the categorization of the feedstock as processing residues or post-consumer feedstock is not available at the point of receipt, Woodville Pellets shall include the supplier in the supplier audit sample and conformance with the relevant SBP requirements shall be confirmed prior to the feedstock being used. This approach aligns with Woodville Pellets' CoC procedure for nonconforming products. (ID REDIII 5.2.3)

2.4 In cases where feedstock received does not comply with purchase specifications and/or the quantities stated on the invoices are incorrect, Woodville Pellets takes immediate corrective actions, as articulated in its CoC procedure for nonconforming products. These actions shall be recorded and communicated to the Certification Body during the annual audit. (ID REDIII 5.2.4)

Supplier audit for processing residues and post-consumer feedstock

3.5 Woodville Pellets' supplier audit program evaluates and verifies documents and other evidence related to the quantity, quality and conformance with SBP definitions of processing residues and post-consumer feedstock, including:

- Supplier's instructions or procedures put in place to control and classify the processing residues and/or post-consumer feedstock
- When applicable, training or instructions provided to the supplier's personnel in relation to categorization and control of processing residues and/or post-consumer feedstock
- Evidence establishing feedstock origin (for example photographs, addresses of processing locations, invoices). (ID REDIII 5.3.5)

3.6 Woodville Pellets seeks additional evidence beyond a declaration from the supplier (even if part of the contractual agreement), as proof of origin and feedstock category. (ID REDIII 5.3.6)

3.7 Woodville Pellets documents supplier audits, including a record of audit date, findings, names and qualifications of auditors and examples of evidence concerning categorization of feedstock. (ID REDIII 5.3.7)

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).