September 03, 2026

Publication of Stakeholder Consultation
https://woodvillepellets.com/responsibility/

Re: Stakeholder Consultation: Woodville Pellets Migration to SBP v2.1

Dear Stakeholder,

Woodville Pellets is a manufacturer of sustainably produced biomass pellets in Woodville, Texas, and is a subsidiary of Graanul Invest Group.

Woodville Pellets is committed to ongoing certification to the applicable Sustainable Biomass Partnership (SBP) Standards (Version 2.1), as well as complying with applicable environmental, social, health and safety laws and regulations and the mass balancing of feedstock and wood pellets in compliance with the Renewable Energy Directive III (RED III). This includes a commitment to decent working conditions and labor rights.

Woodville Pellets has set an overall goal of promoting the use of renewable wood energy, reducing wood waste and decreasing greenhouse gas emissions. The use of woody biomass as a replacement for fossil fuels is a proven way to improve forest utilization, facilitate regeneration of the forest, reduce the risk of wildfire, reduce carbon emissions, and improve international trade in forest-based products.

Stakeholder Consultation
Woodville Pellets is undertaking a stakeholder consultation in 2026 in response to a range of elements. In March, SBP released new guidance for its Standard 4: Chain of Custody specific to the Stakeholder Engagement Plan. While this guidance is not normative and "serves as a supporting resource," Woodville Pellets is informed by the availability of the resource in its ongoing commitment to continuous improvement and meaningful stakeholder engagement.

To support its stakeholder engagement, Woodville Pellets has developed a Stakeholder Impact Assessment (SIA). The approach serves as a practical guide to the identification and prioritization of relevant stakeholders and pathways for engagement. A range of tools and methods are deployed to help support that the assessment is systematic, inclusive, and aligned with SBP's sustainability criteria and Chain of Custody requirements.

Additionally, Woodville Pellets invites your comments on our Sustainable Biomass Program (SBP) certification program, as we migrate to Version 2.1 (v2.1) of those standards. SBP is a certification program designed for biomass, including wood pellets and chips, biochar, biocarbon, and other products used for sustainable energy, industry, or beyond. The SBP scheme provides assurance that biomass is sourced legally and sustainably, enabling companies in the bioeconomy sector to demonstrate compliance with regulatory requirements.

Woodville Pellets has maintained SBP certification and is now preparing for third party certification in alignment with the SBP v2.1 requirements, leveraging the SBP Regional Risk Assessment (RRA) for US National Forest, and the SBP Regional Risk Assessment (RRA) for Private Lands in the United States. The use of SBP-endorsed RRAs is required for all biomass producers that source within the RRA-covered region, for both primary forest sourcing and the use of residual feedstocks, which are waste streams from sawmills and other primary manufacturing operations. Woodville Pellets' previous company risk assessments, also known as supply base evaluations, are available at the SBP website, for your reference.

The RRAs specify risks, including those related to biodiversity, high conservation values, forest loss and clearcut size on private lands, as well as carbon stocks associated with land use, land use change and forestry (LULUCF), following the US's exit from the Paris Agreement. The RRA identifies supply base verifiers, which facilitate the assessment of the risks that Woodville Pellets must manage in the context of its defined supply base, and means of verification, which is the collection of evidence used to verify compliance with a specified criterion.

Additionally, the RRAs also identify specific risk management measures (RRMs) which have been integrated into our risk management plan. Woodville Pellets may also develop and implement additional RRMs, based on the best available practice, knowledge of its specific suppliers and risk factors, and other relevant factors.

Using SBP RRAs, Woodville Pellets has identified that risk mitigation measures apply to its operations and relevant operators associated with sourcing from private lands per the table below.

Indicator with Specified Risk	**RMM Description**	**Who RRM applies to**	**Timeline for RRM implementation**
2.1.3	Specified in RRA	Woodville Pellets; operators	Ongoing
2.2.1	Specified in RRA	Woodville Pellets operators	Ongoing
2.2.2	Specified in RRA	Woodville Pellets; operators	Ongoing
2.2.13	Specified in RRA	Woodville Pellets; operators	Ongoing
3.1.1	Specified in RRA	Woodville Pellets; operators	Ongoing

Operators include suppliers, outsourcers and others that handle feedstock in support of production, which could potentially impact SBP Standard 1 sustainability risk ratings. This generally includes suppliers and any direct contracts for transport of unprocessed feedstock. Woodville Pellets maintains a list of salient operators.

RMMs are documented, with records of implementation maintained. Our risk management plan is signed off by Woodville Pellets' senior management via the annual submission of the SBR via the SBP Portal. Woodville Pellets monitors the effectiveness of its RMMs at least every 12 months prior to its third-party audit, as well as through a sampling system specified in its supplier verification program and its own internal audit process. Woodville Pellets shall discontinue sourcing from suppliers who, following request, fail to demonstrate that they are implementing RMMs. Where RMMs are found to have not been effective in mitigating risk Woodville Pellets shall consider the feedstock not SBP-compliant, until the company implements further mitigation measures and verifies their effectiveness.

Your feedback is essential to this process and to our efforts to evaluate and demonstrate that our sources are low risk. Allowing at least one month before finalization, we kindly request your feedback on our supply base evaluation, risk mitigation plan, as outlined above and the RMMs, as specified in conjunction with the SBP RRAs and their risk assessment and means of verification.

To submit written comments as part of our Stakeholder Consultation process, please feel free to contact me within the next thirty (30) days by email or letter to the address indicated below. Woodville Pellets Sustainable Biomass Policy is available online and our Product Group List is available upon request. Please make direct comments to Elizabeth Denna, EHS Manager at Elizabeth.Denna@graanulinvest.com.

Thank you,

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