Compliance with the SBP Framework: Public Summary Report

Preferred by Nature OÜ
Evaluation of Vattenfall Energy Trading Netherlands N.V., Hamburg branch

Re-assessment

Sustainable Biomass Program
sbp-cert.org

Completed in accordance with the CB Public Summary Report Template Version 2.1 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

Version 2.0	**Published 10 August 2023**
Version 2.1	Published 21 May 2025

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1 Overview

Certification Body (CB) Name:	Preferred by Nature OÜ
Primary CB contact for SBP:	Pilar Gorria Serrano
Primary CB contact email:	pgorria@preferredbynature.org
Audit team leader:	Igor Miilvee
Audit team members:	Liene Suveizda
Name of the Company:	Vattenfall Energy Trading Netherlands N.V., Hamburg branch
Company legal address:	Amerigo-Vespucci-Platz 2, 20457 Hamburg, Germany
Company contact for SBP:	Silke Sepbach
Company contact email:	silke.sepbach@vattenfall.de
Company website:	group.vattenfall.com/what-we-do/our-energy-sources/biomass
Date of installation:	
SBP Certificate Code:	SBP-01-49
Date of certificate issue:	07 Nov 2021
Date of certificate expiry:	06 Nov 2026
Audit closing meeting date:	03 Jun 2026
Audit cycle:	Re-assessment

2 Audit conclusions

2.1 Certification decision

Based on the auditor's recommendation and the Certification Body's technical review, the following certification decision is taken:	
Certification decision:	Certification approved
Certification decision by (name of the person):	Kersti Kuum
Date of decision:	13 Jul 2026
Other comments:	N/A

2.2 Open non-conformities and observations

NC number 9330	NC Grading: Observation
Standard:	SBP Standard 4: Chain of Custody v2.0
Requirement:	1.12 The Organisation shall maintain accurate, complete, up to date and accessible records and reports covering all applicable SBP requirements applicable to the certificate scope, including at least the following: – training records, – subcontractors, – suppliers, – purchases, – determination of conversion rates, – sales, – material accounting including an annual summary, – stakeholder comments, feedback and complaints, – handling of non-conforming products, – record to support Standard 5 requirements, and – internal audit reports. Note: the DTS can be referenced for available records where applicable. N/A N/A N/A
Description of Non-conformance and Related Evidence:	
The organisation is encouraged to begin preparations for the transition to SBP Standards v2.1, which become effective on 29 July 2026, with the transition period concluding on 28 October 2027. As the updated standards and supporting documentation are now publicly available from SBP, early review of the revised requirements would facilitate timely identification of any necessary changes to the management system, procedures, and personnel training arrangements. The organisation should consider undertaking a gap assessment against SBP Standards v2.1 and developing a transition plan to support implementation within the published transition timeframe.	
Timeline for Conformance:	N/A
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

2.2 Closed non-conformities

2.3 Actions taken by Organisation Prior to Report Finalisation

None.

2.4 Notes for the next Audit

Audit period is the calendar year.

3 Scope of the audit and SBP certificate

Scope item	Check all that apply to the Certificate scope
Primary activity	Trader
Secondary activity	
Approved Standards	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
Product Group IDs	☐ Forest feedstock (1A) ☐ Trees outside forest (TOF) - Urban and landscape feedstock (2A) ☐ Trees outside forest (TOF) - Agricultural land feedstock (3A) ☐ Processing residues feedstock (4A) ☐ Post-consumer feedstock (5A) ☒ Other (please specify)
SBP Feedstock types	☒ SBP Compliant; ☒ SBP Controlled
Includes Supply Base Evaluation (SBE)	No
Includes EU RED Scheme	Yes
Includes EU RED Supply Base Evaluation (SBE)	No
Products	WB 2.1 Wood chips, WB 1.1 Wood pellets
Feedstock origin (countries):	
SBP-endorsed Regional Risk Assessments used: **Public link:** **https://sbp-cert.org/documents/standards-documents/risk-assessments/**	Not applicable
Chain of custody system	☒ Physical separation ☐ Mass balance
Outsourcing	Yes
Changes in the scope	Reassessment. Certificate scope is trader (with physical possession) instead of End-user.

3.1 Description of the company

Guidance: Please describe the type, structure and operations of the company including its role in the supply chain, its inputs and outputs as they related to SBP Standards.

Vattenfall Energy Trading Netherlands N.V. is the certificate holder and acts through its Hamburg Branch, which operates within Vattenfall's Business Area Markets / Business Unit Trading. The organisation's SBP scope covers trading of woody biomass, mainly wood pellets and wood chips, as a trader with stock; it does not produce or process biomass. The current Hamburg Branch address is Amerigo-Vespucci-Platz 2, 20457 Hamburg, and the organisation holds SBP certificate SBP-01-49 and FSC CoC certificate PBN-COC-026083. Certified biomass is purchased from SBP-certified suppliers and sold to downstream customers with applicable SBP claims via the SBP Data Transfer System. The organisation may take legal ownership of biomass stored at outsourced storage sites in Riga, currently Port Milgravis and Port Magnat, where biomass is physically segregated by supplier and claim characteristics. For FSC, the organisation applies the transfer system. The SBP scope also includes SBP Standard 5, Instruction Document 5E, and SBP EU RED bridging requirements for Directive EU/2023/2413.

3.2 Site details

Legal entity name	Address	Site Activity	Visited during the audit
Vattenfall Energy Trading Netherlands	Amerigo-Vespucci-Platz 2, 20457, Hamburg, Germany	Office, trading	☐
Port Milgravis SIA	Port Milgravis, Meldru str 3. Riga, 1015, Latvia	Storage in Port Riga and port handling	☒
Port Milgravis SIA	Port Magnat, Daugavgrivas 83 Riga, 1055, Latvia	Storage in Port Riga and port handling	☒

3.3 Detailed description of the Chain of Custody system and Product Groups

Guidance: Please describe the operation of the CoC system including details of the mass balance management and a list of established Product Groups.

Vattenfall Energy Trading Netherlands N.V., Hamburg Branch operates a Chain of Custody system for trading woody biomass as a trader with stock. The organisation purchases certified biomass from SBP-certified suppliers, verifies supplier certification and transaction information, and transfers claims to customers through the SBP Data Transfer System. The CoC system is based on physical separation / segregation during storage and handling. Biomass is stored separately by supplier and relevant claim characteristics at outsourced storage facilities in Riga, currently Port Milgravis and Port Magnat. The organisation retains legal ownership of the biomass while it is in outsourced storage, and the storage provider records inputs, outputs and stock balances. For FSC, the organisation applies the transfer system. No processing or conversion takes place, and the products are traded unchanged; therefore, conversion factors are not applicable. For SBP and SBP EU RED-compliant stock-held biomass, physical segregation is supported by inventory and claim-balance records to ensure that outgoing claims do not exceed eligible physical stock. The established product groups within the SBP scope are wood pellets and wood chips. The organisation's primary traded product during the audit period was industrial wood pellets.

4 Specific objective of the audit

The specific objective of this reassessment was to confirm that the Biomass Trader's management system can ensure that all requirements of the specified SBP Standards are implemented across the entire scope of certification.

The scope of the evaluation covered:
- Review of the Organisation's management procedures, including requirements designated in the applicable SBP scope;
- Standards and Instruction Documents;
- Review of FSC system control points, analysis of the existing FSC system;
- Interviews with responsible staff;
- GHG data collection analysis;
- Evaluation of compliance with the SBP Framework for meeting EU RED (REDIII) requirements;
- Stakeholder Engagement Plan;
- Business integrity.

5 Evaluation process

5.1 Timing and duration of evaluation activities

Audit Level of Effort (LoE)		
Activity	**Auditors**	**Auditor hours**
1. Preparation	IM	3.0
2. On-site (excl. travel time)	IM	6.0
3. Report writing	IM	8.0
1. Preparation	LS	0.5
2. On-site (excl. travel time)	LS	2.0
3. Report writing	LS	0.5

5.2 Auditor team qualification

Auditor qualification		
Auditor name	**Role**	**Qualification**
Igor Miilvee	Audit team leader	Preferred by Nature Certification, FSC, PEFC and SBP specialist and lead auditor. BSc in Ecology and Biodiversity Conservation and MSc in Biochemistry and Molecular Ecology. Has worked in Estonian state and private environmental research institutions in the fields of industrial GHGs and air pollutant monitoring, climate change adaptation and forest monitoring. Auditing experience from Estonia, Finland, Ukraine, Germany, UK.
Liene Suveizda	Audit team member	As a Supply Chain Specialist in Preferred by Nature, Liene conducts Forest Stewardship CouncilTM (FSCTM) Chain of Custody (CoC), Controlled Wood and Forest Management audits for a portfolio of clients in Latvia. She also has experience and qualifications to conduct Sustainable Biomass Program (SBP) and Programme for the Endorsement of Forest Certification (PEFC) CoC audits. Liene has studied biology, forest ecology and has a Master's degree in biology. She has also studied law at the School of Business Administration, TURĪBA, Riga, Latvia.

5.3 Description of evaluation activities

The 2026 SBP reassessment was conducted on **02–03JUN26** as a combined remote and on-site audit. The remote evaluation covered the SBP management system, CoC procedures, supplier verification, transaction records, DTS use, volume summaries, stock / claim controls, SREG / energy and carbon data, and SBP EU RED procedures.

Evaluation methods included document review, staff interviews, transaction sampling, review of DTS records, supplier and subcontractor records, internal audit and training records, and assessment of critical control points for supplier approval, claim acceptance, storage segregation, DTS transactions and stock / claim reconciliation.

The outsourced storage activities were evaluated on-site in Riga on **03JUN26** at **Port Magnat** and **Port Milgravis**. The auditor interviewed site personnel, reviewed waybills and stock records, and confirmed supplier-specific storage and segregation controls. No site non-conformities were identified.

The EU RED evaluation confirmed that documented procedures, training, supplier checks, DTS controls and stock / claim records were in place for SBP EU RED-compliant biomass. No EU RED non-conformities were identified.

Organisation's representatives based on the triangulated evidence gathered through interviews, document review, and site visits.

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5.4 List of forest management units and feedstock suppliers visited

☒ N/A – No forest sites or suppliers visited during this evaluation
N/A

5.5 Describe audit sampling methodology used

Audit sampling was risk-based and covered document review, interviews, DTS transaction sampling and physical site verification. The auditor reviewed the organisation's SBP procedures, supplier list, subcontractor records, training records, internal audit records, volume summary, mass balance / stock records, and selected purchase and sales documentation. DTS transactions were sampled to verify incoming and outgoing claims, transaction references, supplier/customer links, and sold-to-non-SBP handling. Sampling focused on critical control points including supplier certification verification, receipt and claim acceptance, DTS transaction control, stock / claim reconciliation, EU RED claim handling, and outsourced storage segregation. The sample considered current 2026 supplier activity, active contracts, trading volumes, and the transition to SBP EU RED requirements. Staff interviews were conducted with personnel responsible for sustainability management, logistics, trading, DTS handling, supplier verification and storage-site operations. Interviewed personnel included Vattenfall staff and subcontractor personnel at the Riga storage sites. Physical site sampling included visits to both active outsourced storage locations in Riga on 03JUN26: Port Magnat, Daugavgrīvas Street 83, and Port Milgravis, Meldru Street 3. The auditor reviewed storage records, waybills, stock levels and segregation practices, and interviewed site personnel involved in reception, accounting, storage and loading operations. This represented a full sample of active outsourced storage locations in scope.

5.6 CB stakeholder engagement

☒ N/A – Certification Body stakeholder consultation not applicable for this evaluation

Guidance: Please specify the number and types of stakeholders engaged, method of engagement and its outcomes.

5.7 Stakeholder feedback and response

☒ N/A – Certification Body stakeholder consultation not applicable for this evaluation

5.8 Main strengths and weaknesses of the management system and operations

Strengths: The organisation demonstrated a well-established SBP management system with documented procedures, defined responsibilities, training records, internal audit records, supplier verification controls, and use of the SBP DTS for transaction control. The 2026 supplier list included current SBP certificate details, validity dates and verification dates for active suppliers.

The outsourced storage controls were also found to be effective.

For SBP EU RED, documented procedures, supplier checks, DTS controls, training and stock / claim records were available.

Weaknesses: No major weaknesses were identified. Some opportunities for continued improvement remain in maintaining fully harmonised documentation and records, particularly where legacy terminology or references remain in supporting documents. These issues did not affect the overall conclusion of conformity.

5.9 Summary of evaluation activities for robustness of the Supply Base Evaluation

☒ N/A – Standard 1 not in the scope of the evaluation

5.10 Summary of evaluation activities for Processing residues and/or Post-consumer feedstock requirements per Standard 2 and EU RED

☒ N/A – processing residues and/or post-consumer feedstock not used.

5.11 Summary of evaluation activities for chain of custody system per Standard 4

The organisation's Chain of Custody system was evaluated against **SBP Standard 4, Version 2.0**. The assessment covered the documented SBP procedures, supplier verification, input and output documentation, DTS transaction records, stock / claim records, subcontracted storage controls, and sales claim handling.

Vattenfall Energy Trading Netherlands N.V., Hamburg Branch operates as a **trader with stock**. Certified biomass is physically segregated at outsourced storage sites, while Vattenfall retains responsibility for supplier approval, claim control, DTS transactions and sales claims.

The audit included sampling of purchase and sales records, DTS transactions, supplier records, volume records and outsourced storage records. Both active Riga storage locations, **Port Magnat** and **Port Milgravis**, were visited on **03JUN26**, and site personnel were interviewed. The auditor confirmed storage segregation and recordkeeping controls.

The CoC system was found to be functioning in line with SBP Standard 4.

5.12 Summary of evaluation activities for collection and communication of data per Standard 5

The organisation's conformity with **SBP Standard 5** and **Instruction Document 5E v2.1** was evaluated through review of documented procedures, DTS records, transaction samples, volume summaries, stock / claim records, and interviews with staff responsible for logistics, claim handling and sustainability data. The audit assessed whether required data for biomass transactions, including batch information, sustainability characteristics, transport data and energy / carbon information, were collected, recorded and communicated through the SBP DTS where applicable.

Vattenfall Energy Trading Netherlands N.V., Hamburg Branch does not produce or process biomass; therefore, no production energy-use data or conversion-factor calculations are applicable. Where additional transport data are required, the organisation's procedures require completion of SREG information in accordance with Instruction Document 5E. The audit found that responsibilities and procedures for energy and carbon data collection are defined and proportionate to the organisation's role as a trader.

DTS transaction records and supporting documents were sampled to verify that transaction information and sustainability data were traceable and supported by evidence. The organisation demonstrated adequate systems for recording and communicating relevant Standard 5 data, and no non-conformities were identified for Standard 5.

5.13 Summary of audit findings for competency of involved personnel

The main responsible person for the SBP and FSC systems is **the Sustainability Manager**, who is appointed as SBP and FSC Coordinator. Interviews and document review confirmed that the responsible personnel have appropriate knowledge of SBP requirements, including supplier verification, DTS transaction handling, recordkeeping, training, internal audit, subcontractor control, and SBP EU RED requirements.

Other interviewed personnel involved in biomass trading, logistics and claim management demonstrated adequate understanding of their responsibilities and the relevant SBP procedures. Training records for 2026 were available and covered SBP requirements, FSC requirements and health and safety topics.

Subcontractor personnel at the Riga storage sites were also interviewed during the site visit on **03JUN26**. They demonstrated awareness of reception, recordkeeping, weighing, storage segregation and loading procedures.

5.14 Summary of audit findings for GHG methodology per Standard 6 (if applicable)

☒ N/A – Standard 6 not in the scope

6 Detailed evaluation of BP’s Supply Base Evaluation (if applicable)

☒ N/A – Supply Base Evaluation not in the scope of the evaluation

6.1 Overview of BP’s risk assessments and mitigation measures including EU RED scope

N/A

6.2 CB evaluation of specified risk indicators and mitigation measures