



Compliance with the SBP Framework: Public Summary Report

Preferred by Nature OÜ
Evaluation of BIOFELY - FORBACH

Second Surveillance Audit

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

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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:	Francois Gambier
Audit team members:	Francois Gambier
Name of the Company:	BIOFELY - FORBACH
Company legal address:	Lieu dit Trinberschlag rue Holweg, 57600 Forbach, France
Company contact for SBP:	Jean-Marc Cherel
Company contact email:	jean-marc.cherel@engie.com
Company website:	
Date of installation:	23 Jul 2012
SBP Certificate Code:	SBP-10-36
Date of certificate issue:	20 Mar 2024
Date of certificate expiry:	19 Mar 2029
Audit closing meeting date:	04 Feb 2026
Audit cycle:	Second Surveillance Audit

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):	Pilar Gorriá
Date of decision:	01 May 2026
Other comments:	N/A

2.2 Open non-conformities and observations

NC number 8730	NC Grading: Minor
Standard:	SBP Standard 4: Chain of Custody v2.0
Requirement:	1.18 The SEP shall be available upon request in a language(s) that is/are accessible for the identified affected stakeholders. N/A N/A N/A
Description of Non-conformance and Related Evidence:	
The Organisation has not demonstrated how the stakeholder engagement plan is made available upon request. Since no major stakeholders' concerns are on-going, this is a minor Non-Conformity.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

2.2 Closed non-conformities

NC number 8174 copied from 4982 NC Grading: Minor	
Standard:	SBP Standard 4: Chain of Custody v2.0
Requirement:	1.11 The Organisation shall ensure that: a. internal audits are conducted by personnel knowledgeable of the requirements of the Standard(s); b. internal auditors do not audit their own work; c. internal audit documentation includes at minimum the scope of the internal audit; names of the internal auditor(s), date, conclusion of the evaluation of the Organisation's conformance with SBP requirements, and any corrective actions and associated deadlines; and d. any non-conformances found during internal audits are recorded as corrective actions, and actions are taken in a timely and appropriate manner. N/A N/A
Description of Non-conformance and Related Evidence:	
The Organization conducted an internal audit. Although the findings of the internal audit are documented in the PowerPoint document presented to the Engie team, this is insufficient according to what is required by requirement 1.11 c. (names of the internal auditor(s), date, conclusion of the evaluation of the Organisation's conformance with SBP requirements, and any corrective actions and associated deadlines) and d. (any non-conformances found during internal audits are recorded as corrective actions, and actions are taken in a timely and appropriate manner.)	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Internal audit report Discussions with staff
Findings for Evaluation of Evidence:	The Organisation conducted an internal audit. It was demonstrated that the internal auditor is not involved in the activities of the site. This NC is closed.
NC Status:	Closed

NC number 8175 copied from 4983 NC Grading: Minor	
Standard:	SBP Standard 4: Chain of Custody v2.0
Requirement:	1.14 The Organisation shall identify stakeholders, develop, implement, monitor, evaluate and adapt as necessary, a Stakeholder Engagement Plan (SEP) appropriate for their business operations and scope of certification. N/A N/A
Description of Non-conformance and Related Evidence:	
The Organization does not have a Stakeholder Engagement Plan (SEP) tailored to their business activities and the scope of certification as required by SBP requirements. This plan must comply with requirements 1.14 to 1.18 of SBP Standard 4 V2.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date

Evidence Provided by Company to close NC:	LEI-STRA-V0- Enjeux et PIP Discussions with staff
Findings for Evaluation of Evidence:	The Organisation created a SEP in conformance with requirements 1.14-1.1.7. NCR is closed
NC Status:	Closed

NC number 8176 copied from 4984 NC Grading: Minor	
Standard:	SBP Standard 4: Chain of Custody v2.0
Requirement:	1.20 Where non-conforming products and/or associated claims are detected after they have been delivered, the Organisation shall undertake the following activities: a. notify its CB and all affected direct customers in writing within five (5) business days of the non-conforming product claim and maintain records of that notice; b. analysis of causes of the occurrence of non-conforming products claims, and implement measures to prevent their re-occurrence; and c. cooperate with its CB in order to allow them to confirm that appropriate actions were taken to correct the non-conformance. N/A N/A
Description of Non-conformance and Related Evidence:	
The Organization does not document in its manual the steps required by SBP under requirement 1.20 for the management of non-conforming (deviant) products.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Non-conforming products are handled with the section 3.6 of SBP procedure Discussion with staff
Findings for Evaluation of Evidence:	The new version of the SBP manual of the company meets the requirements of this indicator. NCR is closed.
NC Status:	Closed

NC number 8177 copied from 4985 NC Grading: Minor	
Standard:	SBP Standard 4: Chain of Custody v2.0
Requirement:	1.24 The Organisation shall maintain an up-to-date self-assessment covering the implementation of 1.21, 1.22 and 1.23. N/A N/A
Description of Non-conformance and Related Evidence:	
The Organization has not completed a documented self-assessment on the implementation of requirements 1.21 (compliance with laws and regulations), 1.22 (anti-corruption), and 1.23 (occupational health and safety).	

Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Questionnaire SBP - ENGIE ESF Discussions with staff
Findings for Evaluation of Evidence:	The Organisation created a self-assessment for requirements 1.21, 1.22 and 1.23. This NC is closed.
NC Status:	Closed

NC number 8731 NC Grading: Major	
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1
Requirement:	4.2 Use of claims within the DTS The DTS Transaction Batch section includes, as a minimum, the following information: General batch info 1. PB ID 2. Biomass tonnage 3. SBP claim 4. Product Type Additional dynamic batch information can be recorded and submitted in the designated object in the DTS. Market Specific Status: this is the market specific status of the biomass (multiple options can be chosen): – REDII-compliant – NL SDE+ compliant – NL SDE+ controlled – Flanders Restricted: this field indicates that part of the wood pellets production is restricted to a specific feedstock subset such as to facilitate compliance for final use in Flanders according to Instruction Document 6B. The use of these statuses is described in the DTS User Guide. Compliance is monitored through the SBP certification scheme. The DTS allows the BP to make a Claim such that the characteristics in the SAR are valid only on a subset of the feedstock of the BP. N/A N/A
Description of Non-conformance and Related Evidence:	
The organization received from SOVEN 10 transactions from February 2025 to December 2025. In all cases, biomass was received with SBP controlled biomass claim through the DTS (Radix-Tree). From May 2025, France uses Grandfathering clause and RED II with grandfathering clause is applicable and shall be selected in the DTS. However, transactions recorded in the DTS (Radix-Tree) since February 2025 were not selected as EU RED nor RED II Grandfathering clause. Auditor considered this as a break in the use of DTS more than a break in EU RED requirements. End User shares all IT system with origin data with their unique supplier SOVEN.	
Timeline for Conformance:	Other
Evidence Provided by Company to close NC:	Before the finalisation of the report, and less than 3 months after closing meeting, the organisation sent evidence to the auditor to close the relevant NCR. The supplier SOVEN was informed of the errors in transactions shared with the DTS regarding the lack of EU RED claim. This is reflected in the DTS extraction made by the auditor (see Exh. S10)
Findings for Evaluation of Evidence:	It was shown to the auditor that corrected transactions have been sent to the Organisation to add the EU RED information (and negative transactions has been sent to the Organisation to cancel previous inaccurate transactions). The NCR number 8731 (PbN number 2026-002793) can then be closed.
NC Status:	Closed

2.3 Actions taken by Organisation Prior to Report Finalisation



CH submitted implemented corrective action before the report was completed and the Major NCR was closed

2.4 Notes for the next Audit

None

3 Scope of the audit and SBP certificate

Scope item	Check all that apply to the Certificate scope
Primary activity	End User
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; SBP Standard 6: Energy and Carbon Balance Calculation v2.0; Instruction Document REDII: Bridging requirements of the SBP scheme for meeting REDII. v1.2; Instruction Document 6D: Methodology for the Calculation and Certification of GHG Emissions Savings for EU RED 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
Feedstock origin (countries):	France
SBP-endorsed Regional Risk Assessments used:	Not applicable
Public link: https://sbp-cert.org/documents/standards-documents/risk-assessments/	
Chain of custody system	☒ Physical separation ☐ Mass balance
Outsourcing	No
Changes in the scope	France has EU REDII grandfathering clause, which the Organization uses.

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.

BIOFELY: The Forbach District Heating Network has been entrusted to Engie, through a public service delegation since 1988. The network provides electricity, heating and domestic hot water to the equivalent of 7.500 households. In one year the network produces 68.000 MWh of heating and 41.000 MWh of electricity using 85% renewable energy in the form of locally harvested biomass and residues from sawmills. In this process around 69.000 tonnes of wood is consumed annually.

3.2 Site details

Legal entity name	Address	Site Activity	Visited during the audit
BIOFELY - Forbach	RUE DU HOLWEG, 57600 FORBACH, France	End user	☒

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.

The End User accepts biomass in the form of wood chips (Forest feedstock (1A), Post-consumer feedstock (5A) and Processing residues feedstock (4A)) from the only supplier Engie/Soven and uses it as biofuel to produce electricity and heat. The biomass uses the physical segregation system. Biomass is accepted with SBP-controlled claims alongside the SBP-REDII compliant claim. Each truck at the gate is visually inspected to determine the type of biomass, moisture level, weight and quality. The deliveries are registered in the database. In case of non-compliance of biomass with the negotiated characteristics a batch can be rejected.

4 Specific objective of the audit

The specific objective of this evaluation was to confirm that the Energy Producer (EP) management system is capable of ensuring that all requirements of specified SBP Standards are implemented across the entire scope of certification. The EP is an end-user.

The scope of the evaluation covered:

- Review of the Organization's management procedures;
- Review of chain of custody critical control points;
- Interviews with responsible staff;
- Review of the records and calculations;
- GHG data collection analysis;
- REDII system implementation.

5 Evaluation process

5.1 Timing and duration of evaluation activities

Audit Level of Effort (LoE)		
Activity	Auditors	Auditor hours
1. Preparation	Francois Gambier	1.0
2. On-site (excl. travel time)	Francois Gambier	3.0
3. Report writing	Francois Gambier	4.0

5.2 Auditor team qualification

Auditor qualification		
Auditor name	Role	Qualification
Francois Gambier	Lead auditor	François holds a Master's degree in wood engineering from ENSTIB (France) and a PhD in wood and fibre sciences from the Université de Lorraine (France). He is a qualified auditor for FSC CoC and PEFC CoC certifications since 2022, SBP auditor since 2023, PEFC RED since 2025. He is Supply Chain Specialist at Preferred by Nature since 2023.

5.3 Description of evaluation activities

Although audits of energy producers are typically conducted on-site, in Engie's case, Energy Producers limited assurance regime is implemented due to its low risk profile. This includes remote audits and sampling regime. Low risk is based on:

- All sites managed by Engie operate in a similar manner and use the same management system.
- All sites have a single supplier, SOVEN.
- All sites will use default GHG, just one installation might use actual data and this will be audited separately
- No sourcing from far away (all material is from France, Spain or Germany depending on location of the site)
- The audit method alternates between remote and on-site audits, so that on-site audits take place during the certification cycle.

A limited assurance level is implemented and the sampling approach for this year was $0.8 * \text{Square root}(x)$, where x was the total number of Engie sites classified as low profile. As result 4 sites were evaluated on site and 12 site remote.

CH **Audit method**

SBP-10-17 Remote

SBP-10-26 Remote

SBP-10-68 On site
SBP-13-54 Remote
SBP-10-64 Remote
SBP-10-60 Remote
SBP-10-35 On site
SBP-10-40 Remote
SBP-10-36 On site
SBP-10-62 Remote
SBP-10-33 Remote
SBP-10-37 On site
SBP-10-30 Remote
SBP-10-28 On site
SBP-10-29 Remote
SBP-10-25 Remote

BIOFELY - FORBACH audit was conducted onsite on February 04th, 2026. The audit focused on the evaluation of the management system and its implementation: a division of the responsibilities, health and safety, record keeping, input material classification (reception and registration), energy and carbon data collection and communication, REDII sustainability criteria evaluation.

During the opening meeting, the auditor was introduced, the certification scope was clarified, information about the audit plan, methodology, auditor qualification, confidentiality issues, assessment methodology, and other applicable Preferred by Nature policies and procedures was provided.

During the opening meeting the company's responsible persons were introduced as well as core data from the company was presented.

On the same date, interviews and documentation review for the applicable requirements of the SBP standards were conducted. During the process, the overall responsible person for the SBP system and other staff were interviewed. In the course of the audit, critical control points at the stage of biomass acceptance, dumping and storing were evaluated. Traceability documentation was reviewed, following a sampling by the auditor.

By the end of onsite audit, findings were summarized, and preliminary audit conclusions were provided to the Organization's management and SBP responsible person. Following the audit, the auditor completed review of procedures and records that were requested during the audit to formalize conclusions. A good performance was found, and a positive certification decision was concluded at the closing meeting.

5.4 List of forest management units and feedstock suppliers visited

☒ N/A – No forest sites or suppliers visited during this evaluation
 Energy Producer is an end-user sourcing SBP certified material.

5.5 Describe audit sampling methodology used

A sampling has been implemented, based on the following criteria: • Review of procedures; • Review of training records; • Review of information related to suppliers; • Review of delivery documentation and cross-check with DTS; • Interviews with staff

to evaluate theoretical and practical experience of intended approaches implementation. The focus was on key responsible staff.

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

Strength:

- One supplier and clear mutual communications
- Small number of management staff and clearly designated procedures
- Support of an umbrella company
- Robust recordkeeping system, ensuring transparency

For weaknesses, see non-conformities

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

Traceability procedures and documentation were reviewed, following a sampling by the auditor.

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

The End User collects information on energy and carbon from its supplier via DTS and internal database (DDS system). These records include information on types of biomass, energy and carbon in the SAR and SREG documents, delivery records and other relevant data. The data is used to determine the option for the GHG criterion for biomass fuels and the methods of communication of savings.

5.13 Summary of audit findings for competency of involved personnel

A few management persons share responsibilities for maintaining the management system, ensure traceability and data communication. These management persons are not located on site, but they are in constant communication with the site director and personnel to ensure conformance to SBP REDII requirements. During the

assessment the staff showed good knowledge of applicable requirements and effective management of the areas of responsibility was demonstrated, The End User uses the support of an umbrella company and the only supplier - Engie / Soven.

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

The Organization decides to use default values for GHG emission savings (a). The level of saving may vary depending on the feedstock types used by the biomass producers upstream the supply chain. The Organization demonstrated and explained the decision-making system to determine the savings values using Annex VI of the REDII.

According to the EEA (European Environmental Agency) Net greenhouse gas emissions of Land use, Land use change and Forestry (LULUCF) from 1990 to 2021 has been less than zero for all years in the EU. See reference here. Projections for the next period are also negative.

Calculations are recorded. This was reviewed during the audit.

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