



Compliance with the SBP Framework: Public Summary Report

Preferred by Nature OÜ
Evaluation of Queensland Commodity
Exports PTY LTD

First 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:	Lennart Holm
Audit team members:	-
Name of the Company:	Queensland Commodity Exports PTY LTD
Company legal address:	35 Port Drive , 4178 Port of Brisbane, Australia
Company contact for SBP:	Charlie Saykao
Company contact email:	CSaykao@qldcommodity.com.au
Company website:	
Date of installation:	
SBP Certificate Code:	SBP-13-57
Date of certificate issue:	30 Oct 2025
Date of certificate expiry:	29 Oct 2030
Audit closing meeting date:	28 Jul 2026
Audit cycle:	First 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:	24 Sep 2026
Other comments:	N/A

2.2 Open non-conformities and observations

2.2 Closed non-conformities

NC number 9540		NC Grading: Major
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1	
Requirement:	3.1.3 The SAR shall not be approved by the CB if one or more of the following non-conformances are raised: 1. Incoming mass flows of feedstock and biomass produced cannot be reconciliated together with moisture content and physical stock information on the basis of consistent and verifiable data. 2. The BP cannot provide consistent and verifiable figures on the use of fossil fuels for processing (including drying). 3. The BP cannot provide consistent and verifiable data for the transport of the feedstock. 4. The BP cannot provide consistent and verifiable data for the transport of the product. 5. The BP has used falsified or incorrect evidence for justifying data in the SAR. 6. The transaction claims that were established in the DTS by the BP in the Reporting Period do not correspond to the effective production. 7. It is established that the BP has used feedstock, electricity or fossil fuels whose records have deliberately been hidden from the CB. N/A N/A	
Description of Non-conformance and Related Evidence:		
The SAR was produced and presented to the auditor during the audit. These are, however, not deemed approvable since the reporting segments of: Volumes of Feedstock data, are not synchronized with volumes presented in the Mass Balance account and does not contain sufficient and clear justifications for the data used.		
Timeline for Conformance:	3 months from the report finalisation	
Evidence Provided by Company to close NC:	updated SAR Mass balance data and wood flows Interviews with relevant staff	
Findings for Evaluation of Evidence:	Root cause analysis: Lack of understanding around exact requirements of the SAR. Mass balance account not correctly capturing volume of thinning operations and QCE woodflows doesn't capture thinnings volume specifically - Isn't always clear which HQP mill door deliveries are from thinnings. Discussions during the audit clarified the exact requirements of the SAR. The mass balance account was revised to accurately reflect volumes for thinning operations. The whole SAR was reviewed and revised to reflect mass balance thinning volumes, and other data represented in the SAR. More evidence and reasoning behind the data was added into the SAR. Interviews with responsible staff and evaluation of the updated SAR and supporting evidences was sufficient to close the NCR.	
NC Status:	Closed	
Original Due Date:	2026-12-24	
Closing Date:	2026-09-24	
Upgrade Date:	N/A	
Update Date:	N/A	

2.3 Actions taken by Organisation Prior to Report Finalisation

Close NCs

2.4 Notes for the next Audit

Verify effectiveness of the corrective actions related to the NCs

3 Scope of the audit and SBP certificate

Scope item	Check all that apply to the Certificate scope
Primary activity	Biomass Producer
Secondary activity	
Approved Standards	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 EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413; Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1
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)	Yes
Products	WB 2.1 Wood chips
Feedstock origin (countries):	Australia
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	Yes
Changes in the scope	N/A

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.

Queensland Commodity Exports (QCE) is a wood processing and export facility sourcing resources from tree plantations and regrowth native forest, located at the Port of Brisbane. The company is committed to supplying quality product in accordance with certified Chain of Custody systems to assure customers and other stakeholders that the products are sourced and manufactured from well managed forests in which high conservation values are protected and wood supply chains are controlled. QCE is committed to implementing and maintaining bookkeeping systems to manage the certification claims of feedstock and that of the final product. These systems include credit accounts, transfer accounts and mass balance systems. •

Processes and exports softwood and hardwood woodfibre • Stockpile capacity of 150000 green metric tonnes •

Processing and export capacity of up to 600,000 green metric tonnes per annum. QCE has the following existing certification: • FSC Controlled Wood and Chain of Custody • Responsible Wood Chain of Custody Scheme

3.2 Site details

Legal entity name	Address	Site Activity	Visited during the audit
Queensland Commodity Exports PTY LTD	35 Port Drive , 4178 Port of Brisbane, Australia	Biomass Producer	☒

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 Organization has implemented the FSC and RW transfer system for biomass (wood chips only) in the scope of the certificate. As a biomass producer, QCE takes possession of the woody material, through the acquisition of standing timber from owners, from purchases from wood traders and logging companies or, as in case of secondary feedstock, wood chips produced at the supplying sawmill. Physical separation method is used by default. Primary feedstock is being transported to the port and chipped. Biomass is subsequently loaded to vessels and transported to the next in the chain. Biomass is in compliance with EU RED requirements, thus relevant SBP EU RED-Compliant claim will be transferred to the customers. Mass balance is maintained per PGid (01, 03 and 04)

4 Specific objective of the audit

The objective of the audit was to confirm that QCE's management system is capable of ensuring that all requirements of specified SBP Standards are implemented across the entire scope of certification. The scope of this evaluation also covered EU RED requirements for primary and secondary feedstock. The scope of the evaluation covered:

- Review of the BP's management procedures, including requirements designated in applicable SBP Standards and Instruction Documents;
- Review of the production processes, production site visit;
- Review of the Supply Base Report and Level B Evaluation;
- Review of SBP system control points, analysis of the developed Coc system;
- Review of the records and calculations;
- GHG data collection analysis;
- Interviews with responsible staff;
- RED III bridging requirements for meeting EU RED;
- Stakeholder Engagement Plan and Public Consultation;
- Business integrity Self-assessment.

5 Evaluation process

5.1 Timing and duration of evaluation activities

Audit Level of Effort (LoE)		
Activity	Auditors	Auditor hours
1. Preparation	Lennart Holm	4.0
2. On-site (excl. travel time)	Lennart Holm	16.0
3. Report writing	Lennart Holm	8.0
4. Other	Lennart Holm	4.0

5.2 Auditor team qualification

Auditor qualification		
Auditor name	Role	Qualification
Lennart Holm	Lead auditor	Lennart has over 25 years of auditing experience in Forest Management; Chain of Custody, SBP, GGL, Enplus and SDE+ audits, for various CBs. Lead SBP, ENplus, GGL, SDE+ and FSC, PEFC and SFI FM/COC auditor, as well as ISO9001 and ISO14001 lead auditor, and successfully passed the SBP auditor training program for V1 and V2 of the SBP standards

5.3 Description of evaluation activities

This SBP first surveillance audit was carried out between July 27 to July 28, 2026, with a total of 2.0 days used for this audit. The audit was carried out through visits to the QCE office as well as a visits to supplies and suppliers of primary raw materials as well as secondary feedstock, and field inspection of forest properties where the raw material is currently obtained and where active logging is being done. Opening meeting was followed by review of the management system and the SBR and SAR. Requirements for EU RED procedures and Level B risk assessment

for EU RED sustainability requirements were also reviewed. Risk assessment prepared by the organization as well as the mitigation measures were evaluated, evaluation was also supported by field visits as well as revision of supporting documents.

This report is the result of the findings of an audit carried out by an independent lead auditor. The purpose of the assessment was to assess the client's compliance with the standards used within the scope of the certificate. A sufficient amount of people were interviewed during the site and field visits. Critical Control points were evaluated and found to be sufficiently well managed and controlled. A closing meeting was conducted where auditor summarized scope change audit conclusions and next steps where clarified.

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<http://www.preferredbynature.org/impartiality-policy>

5.4 List of forest management units and feedstock suppliers visited

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

Site name
Elliot 225AB
Site location
Gympie
Site description
On-going blowdown salvage logging in an area of 101.32 ha of pinus taeda stand owned by HQplantations. FSC FM certified forest. Only blowdown trees on the ground and danger trees to be removed. Harvesting right purchased by QCE who chip lowest grade wood only while sawlogs are sold to AKD sawmill.
Rationale and focus of visit
Ongoing harvest, verified soil protection measures, reforestation objectives, leave tree characteristics and the cascading principle.
Description of audit activity
Verified Timber Harvest plans and legality documents. interview with supplier and the harvesting team.

Site name
Burrum 214
Site location
Beerburum
Site description
Completed final harvest on 3 parcels of 5.98, 21.15 and 55.36 ha of pinus Taeda pinus taeda stand owned by HQplantations. FSC FM certified forest. Daily surveys for koala bears were completed. Only pulp logs were sold to QCE for chipping.
Rationale and focus of visit
Completed harvest, verified soil protection measures, reforestation objectives, leave tree characteristics and the cascading principle.
Description of audit activity
Verified Timber Harvest plans and legality documents. interview with harvest supervisor

Site name
Pumicestone 226-227
Site location
Beerburum

Site description
Completed final harvest on 2 parcels of 41.37 and 36.27 ha of pinus taeda stand owned by HQplantations. FSC FM certified forest. HCV4 identified adjacent to parcel 227 where no trees were felled into the area. Only pulp logs were sold to QCE for chipping.
Rationale and focus of visit
Completed harvest, verified soil protection measures, HCV4 protection measures., koala surveys, reforestation objectives, leave tree characteristics and the cascading principle.
Description of audit activity
Verified Timber Harvest plans and legality documents. interview with harvest supervisor

Site name
Sawmill 1
Site location
Caboolture
Site description
Sawmill supplying wood chips to QCE
Rationale and focus of visit
To verify the production process of woodchips and origin of the timber
Description of audit activity
Sawmill visit, review of production processes.

Site name
Sawmill 2
Site location
Burpengary
Site description
Sawmill supplying wood chips to QCE
Rationale and focus of visit
To verify the production process of woodchips and origin of the timber
Description of audit activity
Sawmill visit, review of production processes.

5.5 Describe audit sampling methodology used

During audit preparation, a sampling plan was developed based on the following criteria: - A review of documentation related to energy and carbon data for the chosen SAR reporting period. – Inspection of field sites with on-going harvest to verify company procedures and implementation of mitigation measures for Level B. FMUs were randomly selected based on: harvest sites where QCE sourced logs for chipping, active harvesting and type of material sourced. - Visits to supplying sawmills, randomly selected based on the square root of number of sawmills = square root of 2 = 2, thus 2 sawmills were visited.

QCE is located at the port of Brisbane, hence this port was also visited. - All applicable and existing documents and procedures subject to the applicable SBP requirements were reviewed. - All relevant staff were interviewed

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 audit of QCE demonstrated a good level of compliance with the required criteria of the applicable SBP standards. There was reasonable evidence provided to support compliance where a Non-Conformity was not detected.

Weaknesses identified: NCs identified.

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

Verification starts at the company gate where direct observation is conducted, and staff verify delivery documents. Within the scope of RED III, the suppliers of secondary material are visited at least annually, square root of the total number of producers of secondary material. All secondary suppliers sign the RED III self-declaration. In the internal audit purchase manager verify process and systems in the supplier to verify secondary classification, the risk of missing and risk of primary feedstock would be wrongly classified as secondary. Audit report with other evidence as delivery notes, manifestos and pictures are saved for each supplier audit.

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

QCE has developed and implemented Chain of custody system according Standard 4 requirements. During the audit, a valid CoC system description and other documents associated with FSC and RW CoC certification was reviewed. Critical control points of the CoC system were evaluated also during SBP audit. QCE has a Chain of Custody system where they have implemented physical separation method, supported by a Mass Balance system for SBP and RED III requirements. QCE is implementing its DDS system for all primary feedstock sourced, even if certified under FSC and/or RW FM. In case there would be any non-compliant material it would be kept physically separated in the harvest/chipping/port site. The chipping of primary feedstock is always done at

the port. Both pulplogs and sawmill woodchips are transported to the port and the truck supplies a delivery note where the forest stand or the supplying sawmill is indicated. Primary feedstock is chipped at the port for delivery to traders or End-users. For RED III scope, QCE implements a mass balance system with 3 months balancing period.

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

The company's effort to provide comprehensive and reliable data for energy calculation is adequate and the organization has provided data in a clear way in well maintained databases. All data was made available to auditor. The organization satisfied all sections of Standard 5 with no non-conformities issued. The BP has procedures to annually submit SAR to SBP for approval, and procedures to update as warranted.

5.13 Summary of audit findings for competency of involved personnel

Staff members involved into the SBP system management and implementation, include the external consultant, demonstrated awareness of their responsibilities within SBP system. To conduct the risk analysis and implement the SBP certification process, QCE assigned in-house staff of Midway with extensive experience in forest planning, management, and certification. The staff members have all worked on processes related to forest certification in Australia. Midway staff will continue to support QCE with the SBP program and mitigation measures development.

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