



Supply Base Report:

GAZELENERGIE GENERATION

Third 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:	GAZELENERGIE GENERATION
Producer address:	BP 26, F-13590 MEYREUIL, France
SBP Certificate Code:	SBP-10-08
Geographic position:	43.467130, 5.489272
Primary contact:	Gilles Martinez, +33 675 159 669, gilles.martinez@gazelenergie.fr
Company website:	https://gazelenergie.fr/
Date report finalised:	05 May 2026
SBR reporting period from:	01 Jul 2025
SBR reporting period to:	31 Dec 2025
Name of the Certification Body:	Preferred by Nature OÜ
Certification Body Approval date:	21 Aug 2026
SBP Standard(s) used:	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)	France (France)
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

GazelEnergie is a French producer and supplier of conventional energy (electricity, gas) and renewable energy. A subsidiary of EPH, Europe's seventh largest energy company, GazelEnergie is committed to energy transition and new energies.

GazelEnergie has converted its former coal-fired unit into a biomass unit. The transition of unit 4 of the Provence power plant from coal to biomass energy is part of France's energy transition and contribution to climate change mitigation.

With a capacity of 150 MW, the unit contributes to the security of electricity supply in the Provence-Alpes-Côte-d'Azur region through its base load operation. It supplies the equivalent of 125,000 households in the south of France with renewable electricity. This transition has reduced CO2 emissions by 80% compared to coal.

Products included in the scope of SBP Certification: *WB 2.1 Wood chips*

Number of employees: 201

Annual maximum production capacity (metric tonnes): 60000

Number of direct feedstock suppliers: 56

Approximate number of feedstock sub-suppliers: 0

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

GazelEnergie's traceability chain is based on the Mass Balance system. The raw materials used come from forests, non-forest wood preparation centres, and wood waste recovery centres (recycling). Direct suppliers are forest operators, traders and recovery centres. They are located in France (17 departments), Spain, Brazil and Australia. Each supplier is subject to an assessment procedure that includes document verification, certification checks, risk assessment (RRA France) or level B. All foreign suppliers are certified in accordance with SBP REDII/REDIII.

Upon receipt, the raw material is identified as (SBP-compliant, SBP-controlled, non-certified) and recorded in the inventory management system, the Biomass Managing Reporting Tool (BRMT). All delivery information is automatically recorded (quantity, supplier, origin, date, etc.). This system also allows SBP and RED-compliant quantities to be calculated and adjusted.

GazelEnergie is an electricity producer, which means that all biomass received is burned. For various reasons, the company may need to sell biomass. In this case, certified outputs (wood chips) are declared as SBP-compliant biomass and/or RED II-compliant, in accordance with the available volume.

Internal audits are carried out annually in accordance with standards to verify the compliance of the traceability chain and the consistency between incoming and outgoing volumes.

Updated on march 10, 2026 :

Since November 20, 2025, the operation of the Provence Power Plant has been governed by a new prefectural decree, which describes the new supply base, particularly in France, which now extends beyond the initial 17 departments to cover the whole of metropolitan France.

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	France
Area/Region	France
Exclusions	
Feedstock types	Primary feedstock, Processing residues, Post-consumer
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Processing residues feedstock (4A), Post-consumer feedstock (5A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
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, N/A - Post-consumer feedstock
Provide a concise summary of why a SBE was determined to be required or not required here:	
In the national context, GazelEnergie obtains its supplies from 17 departments of the French Mediterranean area. The 17 departments are : Alpes de Haute Provence (04), Hautes-Alpes (05), Alpes Maritimes (06), Bouches-du-Rhône (13), Var (83), Vaucluse (84), Ardèche (07), Drôme (26), Isère (38), Gard (30), Hérault (34), Lozère (48), Aude (11), Pyrénées Orientales (66), Tarn (81), Aveyron (12), Ariège (09). At the level of the local supply basin, the forest represents 4.7 Mha, i.e. 51% of the territory, 73% of which is private owned forest and 27% public bodies forest. The forest is composed of 63% of softwood and 25% of deciduous. The rest (around 12%) is mixed forest. Forest management is governed by the French Forestry Code. Public authorities are in charge of the practical vigilance. Public forests are managed by the Office National des Forêts and private owned forest are supervised by the Centre National de la Propriété Forestière (French public agency under the Ministry of Agriculture authority). Both public and private forests are managed through a validated management plan. In addition, 33.5% and 0.2% of French forest area are respectively certified PEFC and FSC.	

Updated on march 10, 2026 :

Since November 20, 2025, the operation of the Provence Power Plant has been governed by a new prefectural decree, which describes the new supply base and the associated quantities per area as follows :

- International (World) : 150 000 t
- Provence-Alpes-Côte d'Azur (departments 04,05,06,13,83,84) : 80 000 t
- Occitanie (departments 11,12,30,34,38,48,66,81) : 70 000 t
- Auvergne Rhône-Alpes (departments 07,26,38) : 40 000 t
- France (outside the 17 departments above) : 50 000 t
- For post-consumer feedstocks, Gazelenergie can source supplies from across France up to a total of 60 000 t.

To produce 600 GWe per year, Gazelenergie needs around 500,000 tons of biomass. In this context, an additional supply of 50,000 tons across France is discussed with the Authorities.

At this level, the forest represents 17.5 Mha (75% privately owned; 25% publicity owned)

Feedstock types included in SBE:	N/A
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	10.7700

Map(s) of the Supply Base area:

In the national context, GazelEnergie obtains its supplies from 17 departments of the French Mediterranean area. The 17 departments are :
 Alpes de Haute Provence (04), Hautes-Alpes (05), Alpes Maritimes (06), Bouches-du-Rhône (13), Var (83), Vaucluse (84), Ardèche (07), Drôme (26), Isère (38), Gard (30), Hérault (34), Lozère (48), Aude (11), Pyrénées Orientales (66), Tarn (81), Aveyron (12), Ariège (09).

Updated on march 10, 2026 :

Since November 20, 2025, the operation of the Provence Power Plant has been governed by a new prefectural decree, which describes the new supply base, particularly in France, which now extends beyond the initial 17 departments to cover the whole of metropolitan France.

The size of Supply Base area is now 17,5 Mha.

2.3 Feedstock information

- a. **Total volume of Feedstock:** 1-200,000 tonnes
- b. **Volume of primary feedstock:** 1-200,000 tonnes
- c. **List of all the species in primary feedstock, including scientific name:**

Pinus halepensis	Aleppo pine
Pinus sylvestris	Scots pine
Pinus pinaster	Maritime pine
Castanea sativa	Chestnut tree
Picea abies	Spruce
Eucalyptus grandis	Eucalyptus
Abies grandis	Grandis fir
Pinus nigra	Black pine
Quercus ilex	Holm oak

- 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:
- e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 5.00
- f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 95.00
- g. **Proportion of feedstock composed of or derived from saw logs by weight (%):** 0.10
- 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 (%):** 25.00
- j. **Select forest type(s) where the primary feedstock was sourced from:** Other Naturally Regenerated Forest; 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:** 0
Physical form of the feedstock: N/A
- n. **Share of SBP-recognised system claim for processing residues:**
- o. **Volume of post-consumer feedstock:** 1-200,000 tonnes
Physical form of the feedstock: N/A
- p. **Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:** 450000 tonnes
- q. **What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 5470000.00 m3

Explanation: Finally, with the RRA in France, almost all the biomass that could be harvested annually in Supply Base could be EU RED-compliant. The 5,47 Mm³ have been calculated by INRAE during our impact assessment.

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

3.2 Conflicts with applicable national and sub-national legislation

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.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 23 May 2025

Biomass Producer's stakeholder engagement end date: 05 May 2026

Total number of stakeholders contacted: 2000

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

The stakeholder engagement system is guaranteed by:

- The environmental manager and the HSE manager (complaints procedure, communication procedure, consultation procedure, etc.)
- A prefectural decree designating stakeholders and their involvement
- ISO 45001 certification, which guarantees stakeholder integration. This certification is audited annually. Internal audits are also conducted regularly to verify compliance with this certification
- As part of our supplementary impact assessment, we conducted a public inquiry that gathered more than 2,000 comments. Anyone with a direct or indirect interest in the project was able to give their opinion on the biomass power plant via an online register. This inquiry was one of the largest ever conducted in the region, according to the investigating commissioners.

Updated on march 10, 2026 :

Since November 20, 2025, the operation of the Provence power plant has been governed by a new prefectural decree, which describes GazelEnergie's involvement with stakeholders representing the forestry and wood industry. Within the framework of RED III and the regulatory requirements of the prefectural decree, GazelEnergie organized several meetings with regional nature parks, particularly a global meeting gathering all the parks on November 20, 2025. During this meeting, several areas of work emerged:

- Provision of cartographic data to identify harvesting areas in regional nature parks that may be relevant to their harvesting and environmental protection objectives
- Exclusion of Natura 2000 areas from supply, thereby preserving environmentally sensitive areas
- Reflection on the definition of clear-cutting and how to identify it
- Reflection on the definition of old-growth forests and associated cartographic data
- Limiting the impact of forest harvesting on the soil by using the cable yarding technique.

The report has been sent to the CB.

4.2 Response to stakeholder comments

5 Report updates and approval

This document is: New Supply Base Report (Assessments/reassessments)

Summary of changes: N/A

Name	Gilles Martinez
Title	Management representative
Date of report approval	05 May 2026

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	France
Area	France
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	N/A
Level B management system at the level of the forest sourcing area	The Level B risk analysis is based on the Level A risk analysis for France for RED II and incorporates the new RED III criteria as well as an assessment of the situation in the supply area and the additional measures implemented by Gazelenergie. The legality of harvesting operations is considered to be covered by the Level A risk analysis for France.
(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	N/A
Level B management system at the level of the forest sourcing area	The Level B risk analysis is based on the Level A risk analysis for France for RED II and incorporates the new RED III criteria as well as an assessment of the situation in the supply area and the additional measures implemented by Gazelenergie. Forest regeneration in harvested areas is considered to be covered by the Level A risk analysis for France.
(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	N/A
Level B management system at the level of the forest sourcing area	The Level B risk analysis is based on the Level A risk analysis for France for RED II and incorporates the new RED III criteria as well as an

	assessment of the situation in the supply area and the additional measures implemented by Gazelenergie. This point is only partially covered by the Level A risk analysis. In its risk analysis, GazelEnergie undertakes to exclude timber harvesting in these areas unless it is duly justified and relates to public safety (forest fire protection, legal obligations, protection of persons, etc.). This point is verified using mapping tools and checked as a priority during field and documentary audits.
(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	N/A
Level B management system at the level of the forest sourcing area	The Level B risk analysis is based on the Level A risk analysis for France for RED II and incorporates the new RED III criteria as well as an assessment of the situation in the supply area and the additional measures implemented by Gazelenergie. This point is only partially covered by the Level A risk analysis. In its risk analysis, GazelEnergie undertakes to exclude the harvesting of roots and stumps, refuse clear-cutting, commit the supplier to limiting soil compaction, and require the maintenance of dead wood. These requirements are documented and checked during field and documentary audits.
(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	N/A
Level B management system at the level of the forest sourcing area	The Level B risk analysis is based on the Level A risk analysis for France for RED II and incorporates the new RED III criteria as well as an assessment of the situation in the supply area and the additional measures implemented by Gazelenergie. This point is considered to be covered by the Level A risk analysis for France.
(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.

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:

(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.

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 Level B risk analysis is based on the Level A risk analysis for France for RED II and incorporates the new RED III criteria as well as an assessment of the situation in the supply area and the additional measures implemented by Gazelenergie. GazelEnergie is committed to excluding supplies from forests affected by this issue by identifying them using mapping tools and verifying the accuracy of the information during audits.

(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.

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:

(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.

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 Level B risk analysis is based on the Level A risk analysis for France for RED II and incorporates the new RED III criteria as well as an assessment of the situation in the supply area and the additional measures implemented by Gazelenergie. GazelEnergie is committed to excluding supplies from forests affected by this issue by identifying them using mapping tools and verifying the accuracy of the information during audits.

(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	N/A
Level B management system at the level of the forest sourcing area	The Level B risk analysis is based on the Level A risk analysis for France for RED II and incorporates the new RED III criteria as well as an assessment of the situation in the supply area and the additional measures implemented by Gazelenergie. GazelEnergie is committed to excluding supplies from forests and areas affected by this issue by identifying them using mapping tools and verifying the accuracy of the information during audits.

(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	N/A
Level B management system at the level of the forest sourcing area	The Level B risk analysis is based on the Level A risk analysis for France for RED II and incorporates the new RED III criteria as well as an assessment of the situation in the supply area and the additional measures implemented by Gazelenergie. GazelEnergie is committed to excluding supplies from forests and areas affected by this issue by identifying them using mapping tools and verifying the accuracy of the information during audits.

(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	N/A
Level B management system at the level of the forest sourcing area	The Level B risk analysis is based on the Level A risk analysis for France for RED II and incorporates the new RED III criteria as well as an assessment of the situation in the supply area and the additional measures implemented by Gazelenergie. GazelEnergie is committed to excluding supplies from forests and areas affected by this issue by identifying them using mapping tools and verifying the accuracy of the information during audits.
(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. <i>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.</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 Level B risk analysis is based on the Level A risk analysis for France for RED II and incorporates the new RED III criteria as well as an assessment of the situation in the supply area and the additional measures implemented by Gazelenergie. GazelEnergie is committed to excluding supplies from forests and areas affected by this issue by identifying them using mapping tools and verifying the accuracy of the information during audits.
(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	Not applicable, requirement only applies to Level A

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	N/A
Level B management system at the level of the forest sourcing area	The Level B risk analysis is based on the Level A risk analysis for France for RED II and incorporates the new RED III criteria as well as an assessment of the situation in the supply area and the additional measures implemented by Gazelenergie. LULUCF criteria is considered to be covered by the Level A risk analysis for France.

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

Post consumer feedstock have a specific regulatory status and have a regulatory waste code with traceability. Before any delivery, we ask the supplier to communicate a "certificat d'acceptation préalable" which is a product validation on different points : geographical origin, preparation process, waste deposit, quality assurance plan ("Plan d'assurance qualité") and chemical analysis. Then, a sample is taken from each delivery and sent by GazelEnergie for physico-chemical analysis to an independent specialized laboratory (SOCOR). All flows are recorded with a dedicated code in the information system of GazelEnergie (BRMT),

For processing residues and post consumer Feedstock , GazelEnergie maps the GPS coordinates of all production sites to ensure that no forested areas are affected.

Feedstock inspection and classification upon receipt

For suppliers of post-consumer feedstock and, GazelEnergie Generation will check whether these raw materials are eligible for entry into the product groups of the SBP . As such, before consumption, the supplier will produce a "certificate of prior acceptance" for each preparation of a batch of 1,000 tonnes. GazelEnergie Generation will check the conformity of the product with the specifications before any order is placed. Certificates of prior acceptance are archived (Excel spreadsheet) within the Biomass Procurement team.

In addition, for each product receipt, a sample is taken in order to have a physico-chemical analysis established by an independent, COFRAC-accredited laboratory. The analysis results are archived in the GazelEnergie Generation information system.

Supplier audit for processing residues and post-consumer feedstock

We do one on-site audit per year for each suppliers who are not certified by a REDII compliant claim.

The audit makes it possible to verify the deposit, the material, the preparation procedure, the working conditions and the administrative monitoring of the flows.

In addition, our prefectural decree requires us to conduct a quality audit every year, for each supplier.

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).

Country: France - France

Article 29 (2): Soil quality and soil carbon

Biomass fuels produced from waste and residues derived not from forestry but from agricultural land shall be taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 only where operators or national authorities have monitoring or management plans in place in order to address the impacts on soil quality and soil carbon. Information about how those impacts are monitored and managed shall be reported pursuant to Article 30(3).

(i) Impacts on soil quality

Step 1: Identification of applicable laws

Have the applicable law(s) been identified?	Yes
List of applicable law(s)	Environmental, Rural and Urban Planning Code
Sources	Forest code; art. L112-1 Forest code; art. L341-1 Forest code; art. L341-5 Forest code; art. L362-1 Rurale code; art. L111-1 Rurale code; art. L112-1-1 Rurale code; art. L126-1 Rurale code; art. L121-1 Environmental code; art. L110-1 Environmental code; art. L211-1 Urban code; R151-22

Step 2: Description of enforcement and monitoring by competent authorities

Description of the practical implementation and monitoring of the law(s)	ERC measures of the impact analysis
Sources	FRA-RAP-24-00391E-FR Gazel P4B - Complément d'étude d'impact - AECOM 31 janvier 2025 Arrêté préfectoral du 20/11/2025
Is the enforcement and monitoring ensured for the identified law(s)?	Yes

Step 3: Evaluation of the effectiveness of the legal framework

Evaluation of the practical	Site audit of the producing platform
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implementation of the law(s) and explanation for the evaluation	
Sources	arrêté préfectoral n°2024-211-PC
Is legal framework effective?	Yes
Step 4: Detailed description of a management plan and monitoring at economic operator level	Charter of best practices (Appendix 4 of the biomass supply contract)
(ii) Impact on soil carbon	
Step 1: Identification of applicable laws	
Have the applicable law(s) been identified?	No, management plan needed at economic operator level (go to step 4)
List of applicable law(s)	N/A
Sources	N/A
Step 2: Description of enforcement and monitoring by competent authorities	
Description of the practical implementation and monitoring of the law(s)	N/A
Sources	N/A
Is enforcement and monitoring ensured for the identified law(s)?	No, management plan needed at economic operator level (go to step 4)
Step 3: Evaluation of the effectiveness of the legal framework	
Evaluation of the practical implementation of the law and explanation for the evaluation	N/A
Sources	N/A

Is legal framework effective?	No, management plan needed at economic operator level (go to step 4)
Step 4: Detailed description of a management plan and monitoring applied at economic operator level	low impact machines (low-pressure tyres, etc.)

Article 29 (3a): Protection of land with high biodiversity value

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:

- (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.*

Description of a management system process to meet the requirement.	Charter of best practices (Appendix 4 of the biomass supply contract) and Article 8.1.1 Prefectural decree prohibiting clear-cutting and harvesting in Natura 2000 sites, except where exemptions apply.
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Article 29 (3b): Protection of land with high biodiversity value

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:

- (b) *highly biodiverse forest and other wooded land which is species-rich and not degraded, or 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;*

Description of a management system process to meet the requirement.	Charter of best practices (Appendix 4 of the biomass supply contract) and Article 8.1.1 Prefectural decree prohibiting clear-cutting and harvesting in Natura 2000 sites, except where exemptions apply. Sampling of the suppliers with audit site regarding the compliance with EU RED requirements
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Article 29 (3c): Protection of land with high biodiversity value

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:

(c) *areas designated:*

(i) *by law or by the relevant competent authority for nature protection purposes; or*

(ii) *for the protection of rare, threatened or endangered ecosystems or species recognised by international agreements or included in lists drawn up by intergovernmental organisations or the International Union for the Conservation of Nature, subject to their recognition in accordance with the first subparagraph of Article 30(4), unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*

(i)

Description of a management system process to meet the requirement.

Charter of best practices (Appendix 4 of the biomass supply contract) and Article 8.1.1 Prefectural decree prohibiting clear-cutting and harvesting in Natura 2000 sites, except where exemptions apply. Sampling of the suppliers with audit site regarding the compliance with EU RED requirements

Article 29 (3d): Protection of land with high biodiversity value

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:

(c) *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.*

Description of a management system process to meet the requirement.	Charter of best practices (Appendix 4 of the biomass supply contract) and Article 8.1.1 Prefectural decree prohibiting clear-cutting and harvesting in Natura 2000 sites, except where exemptions apply. Sampling of the suppliers with audit site regarding the compliance with EU RED requirements
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Article 29 (3e): Protection of land with high biodiversity value

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).*

Description of a management system process to meet the requirement.	Charter of best practices (Appendix 4 of the biomass supply contract) and Article 8.1.1 Prefectural decree prohibiting clear-cutting and harvesting in Natura 2000 sites, except where exemptions apply. Sampling of the suppliers with audit site regarding the compliance with EU RED requirements
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Article 29 (4a): Protection of land with high carbon stock

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;*

This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.

Description of a management system process to meet the requirement.	Charter of best practices (Appendix 4 of the biomass supply contract) and Article 8.1.1 Prefectural decree prohibiting clear-cutting and harvesting in Natura 2000 sites, except where exemptions apply. Sampling of the suppliers with audit site regarding the compliance with EU RED requirements
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Article 29 (4b): Protection of land with high carbon stock

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:

- (b) continuously forested areas, namely land spanning more than one hectare with trees higher than five metres and a canopy cover of more than 30 %, or trees able to reach those thresholds in situ;

This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.

Description of a management system process to meet the requirement.	Charter of best practices (Appendix 4 of the biomass supply contract) and Article 8.1.1 Prefectural decree prohibiting clear-cutting and harvesting in Natura 2000 sites, except where exemptions apply. Sampling of the suppliers with audit site regarding the compliance with EU RED requirements
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Article 29 (4c): Protection of land with high carbon stock

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:

- (c) land spanning more than one hectare with trees higher than five metres and a canopy cover of between 10 % and 30 %, or trees able to reach those thresholds in situ, unless evidence is provided that the carbon stock of the area before and after conversion is such that, when the methodology laid down in Part C of Annex V is applied, the conditions laid down in paragraph 10 of this Article would be fulfilled.

This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.

Description of a management system process to meet the requirement.	Charter of best practices (Appendix 4 of the biomass supply contract) and Article 8.1.1 Prefectural decree prohibiting clear-cutting and harvesting in Natura 2000 sites, except where exemptions apply. Sampling of the suppliers with audit site regarding the compliance with EU RED requirements
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Article 29 (5): Protection of peatland

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.

Description of a management system process to meet the requirement.	Charter of best practices (Appendix 4 of the biomass supply contract) and Article 8.1.1 Prefectural decree prohibiting clear-cutting and harvesting in Natura 2000 sites, except where exemptions apply. Sampling of the suppliers with audit site regarding the compliance with EU RED requirements
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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).