# Compliance with the SBP Framework: Public Summary Report

## Preferred by Nature OÜ
## Evaluation of PLAINE COMMUNE ENERGIE - FORT DE L'EST

## 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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|---|---|
| **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:** | Yves Bouthillier |
| **Audit team members:** | None |
| **Name of the Company:** | PLAINE COMMUNE ENERGIE - FORT DE L'EST |
| **Company legal address:** | 1 rue du marechal LYAUTEY, 93200 Saint-Denis, France |
| **Company contact for SBP:** | Kahina Idrici |
| **Company contact email:** | kahina.idrici@engie.com |
| **Company website:** | |
| **Date of installation:** | 27 Jul 2016 |
| **SBP Certificate Code:** | SBP-10-33 |
| **Date of certificate issue:** | 19 Mar 2024 |
| **Date of certificate expiry:** | 18 Mar 2029 |

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|---|---|
| **Audit closing meeting date:** | 24 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):** | Christian Jürgensen |
| **Date of decision:** | 21 Apr 2026 |
| **Other comments:** | N/A |

## 2.2 Open non-conformities and observations

| NC number 8645 copied from 4834 | NC Grading: Major |
|---|---|
| **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.<br>N/A<br>N/A<br>N/A |
| **Description of Non-conformance and Related Evidence:** | |
| The Organisation does not document in its manual (Exh. S01) the steps required by SBP under requirement 1.20 for the management of non-conforming (deviant) products. | |
| **Timeline for Conformance:** | Other |
| **Evidence Provided by Company to close NC:** | EXH 01 00 - MANUEL SBP-RED V2.pdf Discussions with staff |
| **Findings for Evaluation of Evidence:** | Updated procedures do not contain the mandatory instructions cited under requirement 1.20 of SBP Standard 4. Minor NC 2025-001442 is upgraded to Major NC with an May 24th, 2026, deadline (closing meeting date + 3 months). |
| **NC Status:** | Open |

| NC number 8648 | 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.<br>N/A |

| | |
|---|---|
| | N/A<br>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 NC. | |
| **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 8642 copied from 4831 | NC Grading: Minor |
|---|---|
| **Standard:** | SBP Standard 4: Chain of Custody v2.0 |
| **Requirement:** | 1.6 Documented procedures shall be reviewed at least annually for completeness and effectiveness.<br><br>N/A<br>N/A |
| **Description of Non-conformance and Related Evidence:** | |
| During the audit, the Organisation has not been able to provide an annual review of its documented procedures to ensure their comprehensiveness and effectiveness. | |
| **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:** | EXH 01 00 - MANUEL SBP-RED V2.pdf Discussions with staff |
| **Findings for Evaluation of Evidence:** | The Organisation updated its procedures following a thorough review to ensure its comprehensiveness and effectiveness. This NC is closed. |
| **NC Status:** | Closed |

| NC number 8643 copied from 4832 | 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.<br><br>N/A<br>N/A |
| **Description of Non-conformance and Related Evidence:** | |
| The Organisation conducted an internal audit (see Exh. S04). The findings of the internal audit are recorded. However, the internal auditor, Kahina Idrici has some responsibilities in the certification of the Organisation (see Exh. S05) and therefore could not audit its own work, according to 1.11 b. | |
| **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:** | EXH 04 Rapport audit interne SBP-RED PCE FDE 2026.pdf Discussions with staff |

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|---|---|
| **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 8644 copied from 4833** | **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.<br><br>N/A<br>N/A |
| **Description of Non-conformance and Related Evidence:** | |
| The Organisation was not able to provide to the auditor a Stakeholder Engagement Plan (SEP) tailored to their business activities and the scope of certification as required by SBP requirements. This plan should 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:** | EXH 05 LEI-STRA-V0- Enjeux et PIP.pdf EXH 06 SITES & ACTIVITES _ Societal action plan template LEI en France 2025.xlsx Discussions with staff |
| **Findings for Evaluation of Evidence:** | The Organisation created a SEP in conformance with requirements 1.14-1.1.7. This NC is closed. For 1.18, see new minor NC issued. |
| **NC Status:** | Closed |

| **NC number 8646 copied from 4835** | **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.<br><br>N/A<br>N/A |
| **Description of Non-conformance and Related Evidence:** | |
| Management committee meetings are held at regional, territorial and national level. Legal, regulatory and health and safety issues are dealt with at these meetings. However, the Organisation was not able to provide a documented and up-to-date 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:** | EXH 09 Questionnaire SBP - ENGIE ESF.docx 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 8647 copied from 4836** | **NC Grading: Minor** |
|---|---|
| **Standard:** | SBP Standard 4: Chain of Custody v2.0 |
| **Requirement:** | 1.4 The scope of the Organisation's CoC certification shall define the product types, the processes applied to these products (including subcontracting), the accounting methodology, and applicable SBP Standards.<br><br>N/A<br>N/A |
| **Description of Non-conformance and Related Evidence:** | |
| The Organisation has defined in its procedure the applicable standards, but the Version 1 of standards is still mentioned (see Exh. S01). | |
| **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:** | EXH 01 00 - MANUEL SBP-RED V2.pdf Discussions with staff |
| **Findings for Evaluation of Evidence:** | The Organisation updated its procedures following a thorough review to ensure its comprehensiveness and effectiveness, ensuring the use of V2 standards. This NC is closed. |
| **NC Status:** | Closed |

## 2.3 Actions taken by Organisation Prior to Report Finalisation

None.

## 2.4 Notes for the next Audit

See non-conformities.

# 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; 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 5E: Collection and Communication of Energy and Carbon data. v2.1; Instruction Document 6D: Methodology for the Calculation and Certification of GHG Emissions Savings for EU RED v2.0 |
| **Product Group IDs** | ☒ Forest feedstock (1A)<br>☐ Trees outside forest (TOF) - Urban and landscape feedstock (2A)<br>☐ Trees outside forest (TOF) - Agricultural land feedstock (3A)<br>☐ Processing residues feedstock (4A)<br>☒ Post-consumer feedstock (5A)<br>☐ 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:**<br><br>**Public link:** **https://sbp-cert.org/documents/standards-documents/risk-assessments/** | Not applicable |
| **Chain of custody system** | ☒ Physical separation<br>☐ 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.*

The company Plaine Commune Énergie is a subsidiary of ENGIE Solutions. As part of a public service delegation entrusted to it by SMIREC, it is in charge of the production and distribution of heat for the heating and domestic hot water needs of users. It serves the equivalent of 61,500 homes, both private buildings and offices, but also municipal buildings such as schools or gymnasiums. The 90 km network extends over five towns: Saint-Denis, L'Île-Saint-Denis, Pierrefitte-sur-Seine, Stains and Aubervilliers. The Plaine Commune Energie heating network is the first network in Seine-Saint-Denis and the second largest in Île-de-France. More than 50% of its heat production is mainly renewable thanks to biomass and geothermal energy. The use of these renewable energies makes it possible to avoid more than 56,000 tonnes of $CO_2$ per year.

## 3.2 Site details

| Legal entity name | Address | Site Activity | Visited during the audit |
|---|---|---|---|
| PLAINE COMMUNE ENERGIE - FORT DE L'EST | 1 rue du marechal LYAUTEY Saint-Denis, 93200 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 a form of wood chips from the only supplier Engie / Soven and uses it as biofuel to produce electricity and heat. Biomass is acceped with either SBP-compliant or SBP-controlled claims alongside the SBP-RED 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'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 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;
- Review of DTS transactions;
- 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 | Yves Bouthillier | 2.0 |
| 2. On-site (excl. travel time) | Yves Bouthillier | 2.5 |
| 3. Report writing | Yves Bouthillier | 4.0 |

### 5.2 Auditor team qualification

| Auditor qualification | | |
|---|---|---|
| **Auditor name** | **Role** | **Qualification** |
| Yves Bouthillier | Audit team leader | Yves is a Senior Forestry Specialist - Team Leader with Preferred by Nature (PbN) and a biologist with a specialization in conservation and environment and a master's degree in Earth Sciences. He has been working in the field of environmental certifications since 2014. Yves is qualified to audit the following standards:  - FSC FM, CoC, CW - SBP - CoC for PEFC, SFI and RA SC |

### 5.3 Description of evaluation activities

Although audits of energy producers are typically conducted on-site, in Engie's case, SBP has approved a hybrid approach where some of the sites are assessed remotely and others on-site for Engie Energy Producers audits. This remote audit is justified 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 * 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*

PLAINE COMMUNE ENERGIE - FORT DE L'EST second surveillance audit was conducted remotely on February 24, 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, RED sustainability criteria evaluation and DTS transactions.

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 the audit, findings were summarised, 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 formalise 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
Not applicable. 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 record keeping 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

All feedstock is sourced as already SBP EU RED compliant through one supplier: SOVEN. The auditor verified the system implemented by the organization to ensure all deliveries are in conformance with the applicable requirements and sampled delivery documentation

### 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 it's supplier via DTS and internal database (DDS system). These records include information on types of biomass, energy and carbon in 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. This was reviewed during the audit.

### 5.13 Summary of audit findings for competency of involved personnel

Management persons shares responsibilities for maintaining the management system, ensure traceability and data communication. These persons are not all located on site, but they are in constant communication with the site director and personnel to ensure conformance to SBP RED requirements. During the audit 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 RED.

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 in Format déclaration élec chaleur 2024 v3.xlsx (Folder Déclaration des GES) as reviewed on-screen 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