# Compliance with the SBP Framework: Public Summary Report

## Preferred by Nature OÜ
## Evaluation of Extram SRL

## 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

| | |
|---|---|
| **Version 2.0** | **Published 10 August 2023** |
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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:** | Lucas Schnapper |
| **Audit team members:** | Lucas Schnapper |
| **Name of the Company:** | Extram SRL |
| **Company legal address:** | Rue de Fernelmont 85., 5020 Champion, Belgium |
| **Company contact for SBP:** | Laurent Gillet |
| **Company contact email:** | laurent.gillet@extram.be |
| **Company website:** | |
| **Date of installation:** | |
| **SBP Certificate Code:** | SBP-13-08 |
| **Date of certificate issue:** | 12 Dec 2024 |
| **Date of certificate expiry:** | 11 Dec 2029 |
| | |
| **Audit closing meeting date:** | 25 Jun 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):** | Kersti Kuum |
| **Date of decision:** | 10 Nov 2026 |
| **Other comments:** | N/A |

## 2.2 Open non-conformities and observations

| NC number 9942 | NC Grading: Minor |
|---|---|
| **Standard:** | SBP Standard 2: Feedstock Verification v2.0 |
| **Requirement:** | 1.1.8 The records of feedstock inputs shall include identification of volumes of Primary feedstock, Processing residues and post-consumer feedstock used, and a description of the inputs, including species for the primary feedstock and, if known, for processing residues feedstock.<br>N/A<br>N/A<br>N/A |
| **Description of Non-conformance and Related Evidence:** | |
| Each feedstock type is described in the records of the company. See Exh 10 tab PQ_SBP. However, on the storage site of Libramont, feedstock was described as Primary feedstock in the records, but the audit team saw only processing residues stored on site. This is a minor NCR as the stock was small and the organization was able to explain why these records were not correctly described in the system. | |
| **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:** | Pending |
| **Findings for Evaluation of Evidence:** | Pending |
| **NC Status:** | Open |
| **Original Due Date:** | 2027-11-10 |
| **Closing Date:** | N/A |
| **Upgrade Date:** | N/A |
| **Update Date:** | N/A |

| NC number 9943 | NC Grading: Minor |
|---|---|
| **Standard:** | Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1 |

| | |
|---|---|
| **Requirement:** | 2.4.3 The BP shall justify the data and methodology used for reporting energy and carbon data and this shall be recorded in the SAR and verified by the CB.<br>N/A<br>N/A<br>N/A |
| **Description of Non-conformance and Related Evidence:** | |
| Data available in the company records show 7184T of biomass sold with a SBP claim during the reporting period. Where there was 5814T sold with a Claim in the DTS. However, it was a mistake in the recordings in the company's newly implemented Odoo system, that the sales manager was able to explain correctly. Therefore, the NCR is considered minor. | |
| **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:** | Pending |
| **Findings for Evaluation of Evidence:** | Pending |
| **NC Status:** | Open |
| **Original Due Date:** | 2027-11-10 |
| **Closing Date:** | N/A |
| **Upgrade Date:** | N/A |
| **Update Date:** | N/A |

| **NC number 9944** | **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>N/A<br>N/A<br>N/A |
| **Description of Non-conformance and Related Evidence:** | |
| Extram has defined the procedures for the self-assessment in section 2.4.10 of the SBP procedures. See also exhibits 3.4 and 3.5. However, the self-assessment was not conducted, and only templates of the self-assessment were provided to the audit team. This requirement is known to the company representative and it'simplementation was on progress at the time of the audit. Therefore, this NCR is considered minor. NCR 2026-008368 is issued. | |
| **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:** | Pending |
| **Findings for Evaluation of Evidence:** | Pending |
| **NC Status:** | Open |
| **Original Due Date:** | 2027-11-10 |
| **Closing Date:** | N/A |
| **Upgrade Date:** | N/A |
| **Update Date:** | N/A |

| NC number 10018 | NC Grading: Minor |
|---|---|
| **Standard:** | Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 |
| **Requirement:** | 1.5.2 If any sustainability criteria is designated as specified risk at the national / sub-national level (Level A risk assessment does not indicate low risk for all indicators) or there is no official national / sub-national (Level A) risk assessment available yet, the Biomass Producer shall implement the risk assessment and, if necessary, risk mitigation on a forest sourcing area level (Level B).<br>N/A<br>N/A<br>N/A |
| **Description of Non-conformance and Related Evidence:** | |
| The organization is applying grandfathering clause for areas having a level A risk assessment for REDII (France, Germany and Walloon region of Belgium). However, Luxembourg and Flanders are described by the organization as part of their supply base in the SBR. These areas do not have a Level A for REDII. The organization did not show a level B risk assessment for these areas during the audit. However, considering they did not source primary feedstock from these areas, the NCR is minor. | |
| **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 |
| **Original Due Date:** | 2027-11-10 |
| **Closing Date:** | N/A |
| **Upgrade Date:** | N/A |
| **Update Date:** | N/A |

| NC number 10019 | NC Grading: Observation |
|---|---|
| **Standard:** | SBP Standard 2: Feedstock Verification v2.0 |
| **Requirement:** | 4.1 The Organisation shall prepare a Supply Base Report (SBR) using the SBP Audit Portal.<br>N/A<br>N/A<br>N/A |
| **Description of Non-conformance and Related Evidence:** | |
| SBR in chapter 2 includes EU RED II SBE grandfathering marked as Yes. Biomass Producers wishing to deliver REDII compliant biomass exclusively to countries which have formally adopted the grandfathering clause may opt to demonstrate compliance with SBP Instruction Document REDII: Bridging requirements for meeting REDII v1.2 published 13 November 2024. Choosing 'Yes' to this field should generate Annex 2a - RED II SBE findings. - But this Annex 2a is not visible in the SBR. This is an observation, considering the SBP audit portal should offer the possibility to fill in Annex 2a. | |
| **Timeline for Conformance:** | N/A |

| | |
|---|---|
| **Evidence Provided by Company to close NC:** | N/A |
| **Findings for Evaluation of Evidence:** | N/A |
| **NC Status:** | Open |
| **Original Due Date:** | N/A |
| **Closing Date:** | N/A |
| **Upgrade Date:** | N/A |
| **Update Date:** | N/A |

## 2.2 Closed non-conformities

## 2.3 Actions taken by Organisation Prior to Report Finalisation

Minor adjustments to SBE.

## 2.4 Notes for the next Audit

N/A

## 3 Scope of the audit and SBP certificate

| Scope item | Check all that apply to the Certificate scope |
|---|---|
| **Primary activity** | Biomass Producer |
| **Secondary activity** | Trader |
| **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 5E: Collection and Communication of Energy and Carbon data. v2.1; Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0 |
| **Product Group IDs** | ☒ Forest feedstock (1A)<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)** | Yes |
| **Products** | WB 2.1 Wood chips |
| **Feedstock origin (countries):** | Belgium, Luxembourg, France, Germany |
| **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** | Yes |
| **Changes in the scope** | Scope change, no standard 1, no TOF anymore. |

### 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.*

Extram is a company active in the biomass and forestry sector. It offers a wide range of services: felling, pruning, shredding, stump removal, land cultivation, and purchasing raw materials. Extram markets wood chips, shredded wood, pulpwood, sawn timber, and production residues. Products included in the scope of SBP Certification: Chips Number of employees: 4 Annual maximum production capacity (metric tonnes): 100000 Number of direct feedstock suppliers: 50 Approximate number of feedstock sub-suppliers: 25 Through its activities, Extram supplies biomass to various energy production facilities. The company collaborates with several subcontractors. It focuses primarily on storage, project management, and the resale of raw materials. EXTRAM's supply chain operates in a linear fashion: raw materials, owned by the client or the client's legal entity, are purchased by EXTRAM. These materials are then processed into chips for energy recovery purposes and sold directly to the end user. The raw materials may pass through one of EXTRAM's two sorting and consolidation platforms during this process.

### 3.2 Site details

| Legal entity name | Address | Site Activity | Visited during the audit |
|---|---|---|---|
| Extram | Rue de Fernelmont 85, Namur 5020 Belgium | Office | ☐ |
| CART | Rue du Pré du Pont 7/9, Jodoigne 1370 Belgium | Recycler waste collector | ☒ |
| ECOTRI | Rue de l'industrie 1B, Bernissart 7321 Belgium | BP, chipping, storage | ☐ |
| EXTRAM LIBRAMONT | Rue d'Ochamps, Libramont-Chevigny 6800 Belgium | BP, chipping, storage | ☒ |

### 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.*

Extram has chosen a Chain of Custody system where they have implemented mass balance for supplies that are entering the physical storage prior to supply. In case there would be any non-compliant material it would be kept physically separated in the harvest/chipping site. The chipping is done in the forest and transported by the trucks to the end-users, in Belgium. Post-consumer feedstock is chipped at the storage facilities. Each truck comes with a delivery note where the forest stand is indicated. The material is received by the End-user where the delivery documents are checked and hand over to the receiving entity at the end-user. For EU-RED scope, the BP implements a mass balance system with 3 months balancing period.

# 4 Specific objective of the audit

The objective of this evaluation was assess the compliance of the company's management system to the SBP RED standards.
Moreover, the specific objective of this evaluation was to confirm that the Organization’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 documented procedures;
- Review of the CoC system critical control points;
- Implementation of the PEFC DDS;
- Interviews with responsible staff;
- Review of the records;
- GHG data collection, analysis and assessment of compliance with ID 5E;
- EU RED related procedures, including Level B SBE;
- Stakeholder Engagement Plan;
- Business integrity.

# 5 Evaluation process

### 5.1 Timing and duration of evaluation activities

| Audit Level of Effort (LoE) | | |
|---|---|---|
| **Activity** | **Auditors** | **Auditor hours** |
| 1. Preparation | Lucas Schnapper | 4.0 |
| 2. On-site (excl. travel time) | Lucas Schnapper | 24.0 |
| 3. Report writing | Lucas Schnapper | 8.0 |

### 5.2 Auditor team qualification

| Auditor qualification | | |
|---|---|---|
| **Auditor name** | **Role** | **Qualification** |
| Lucas Schnapper | Auditor | Forest engineer (AgroParisTech), Lucas is currently engaged in the training to become FSC, PEFC and SBP auditor for FM and CoC . He has experience in sustainable forest management and planning since 2015 and has participated in the preparation for the certification of forest companies in Congo and Gabon. |

### 5.3 Description of evaluation activities

Evaluation activities were focused on the management system evaluation: division of the responsibilities, record keeping, input material classification (reception and registration), analysis of the existing chain of custody system and critical control points, as well as sustainability data availability. All documentation connected to the SBP standards and RED, including documented control system, was provided by the Organization prior to the audit and during it.

### 5.4 List of forest management units and feedstock suppliers visited

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

| **Site name** |
|---|
| CART |
| **Site location** |
| Rue du Pré du Pont 7/9, Jodoigne 1370 Belgium |
| **Site description** |

| |
|---|
| Waste collector |
| **Rationale and focus of visit** |
| Supplier of primary, secondary and tertiary feedstock |
| **Description of audit activity** |
| Assessing the appropriate description of feedstock. Assessing COC requirements implementation |

| |
|---|
| **Site name** |
| EXTRAM LIBRAMONT |
| **Site location** |
| Rue d'Ochamps, Libramont-Chevigny 6800 Belgium |
| **Site description** |
| BO, Storage platform, chipping |
| **Rationale and focus of visit** |
| Supplier of primary, secondary and tertiary feedstock |
| **Description of audit activity** |
| Assessing the appropriate description of feedstock. Assessing COC requirements implementation |

| |
|---|
| **Site name** |
| La renardière |
| **Site location** |
| Rue de la Gare, 40 6810 Izel |
| **Site description** |
| Sawmill |
| **Rationale and focus of visit** |
| Visit of secondary feedstock supplier |
| **Description of audit activity** |
| Assessing the appropriate description of feedstock. Assessing COC requirements implementation |

| |
|---|
| **Site name** |
| ILC Bois |
| **Site location** |
| Rue des Clos Champs, 3 5580 Montgauthier Rochefort |
| **Site description** |
| Sawmill |
| **Rationale and focus of visit** |
| Visit of secondary feedstock supplier |

| Description of audit activity |
| --- |
| Assessing the appropriate description of feedstock. Assessing COC requirements implementation |

### 5.5 Describe audit sampling methodology used

The evaluation was designed to reflect the scope of certification, supply chains, and operational specifics of the Organization. As this was a surveillance audit, emphasis was placed on the implementation and effectiveness of the existing management system, as well as its alignment with updated SBP requirements under Version 2. The sampling covered both system-level and data-based verification: mass balance records, DTS transactions, and input/output data were sampled for selected months of 2025 and 2026 to confirm consistency and accuracy of reporting across different reporting periods. Particular attention was given to the business integrity system as part of the SBP V2 requirements. One of the key focus of the sampling strategy was on storage sites and feedstock classification. Therefore, three suppliers were selected, representing different supplier types, countries, and delivery conditions. Sampling of processing residues suppliers was conducted based on the 0,6*square root of the number of active suppliers, ensuring representative coverage of various feedstock categories and supply routes. This approach ensured that the audit covered both system-level controls and practical implementation of risk assessment and mitigation measures, with sampling extended to adequately represent the complexity and diversity of the Organization's current and potential supply base.

### 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 Extram demonstrated a good level of compliance with the required criteria of Standards 1, 2, 4 and 5, and the RED II requirements. There was reasonable evidence provided to support compliance where a Non-Conformity was not detected.

### 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

Post-consumer material is delivered at production and storage facilities, visually evaluated by the staff on each storage platform. The material is also subject to declaration from the suppliers, who are also part of the suppliers audit program of the organization.

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

The audit was combined with an evaluation of the CoC requirements as specified in Std 4. Valid CoC system description and other documents exist. Critical control points of the CoC system were evaluated also during SBP audit. Extram has chosen a Chain of Custody system where they have implemented mass balance system for all feedstock sourced. In case there would be any non-compliant material it would be kept physically separated in the harvest/chipping site. The chipping is either done in the forest and transported by the trucks to the end-users, in Belgium, or delivered to the organization platforms. Each truck comes with a delivery note where the forest stand is indicated. The material is received by the End-user where the delivery documents are checked and hand over to the receiving entity at the end-user. For RED scope, the BP 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

Extram has developed procedures for this and have supplied actual data on Greenhouse Gas emissions, as well as provided a good overview of the requirements for energy data collection. The responsible person, a consultant of Valbiom, has benefited from previous experience with other clients.

### 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, Extram assigned an external consultant with extensive experience in forest planning, management, and certification. He has worked on processes related to forest certification in Belgium and neighboring countries. This external consultant will continue to support Extram with the RA 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