



Compliance with the SBP Framework: Public Summary Report

Preferred by Nature OÜ
Evaluation of Drax Power Limited
Re-assessment

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
Version 2.1	Published 21 May 2025

© Copyright Sustainable Biomass Program Limited 2025

Table of contents

1 Overview	3
2 Audit conclusions	4
2.1 Certification decision	4
2.2 Open non-conformities and observations	4
2.2 Closed non-conformities	6
2.3 Actions taken by Organisation Prior to Report Finalisation	6
2.4 Notes for the next Audit	6
3 Scope of the audit and SBP certificate	7
3.1 Description of the company	8
3.2 Site details	8
3.3 Detailed description of the Chain of Custody system and Product Groups	8
4 Specific objective of the audit	9
5 Evaluation process	10
5.1 Timing and duration of evaluation activities	10
5.2 Auditor team qualification	10
5.3 Description of evaluation activities	10
5.4 List of forest management units and feedstock suppliers visited	11
5.5 Describe audit sampling methodology used	11
5.6 CB stakeholder engagement	11
5.7 Stakeholder feedback and response	11
5.8 Main strengths and weaknesses of the management system and operations	12
5.9 Summary of evaluation activities for robustness of the Supply Base Evaluation	12
5.10 Summary of evaluation activities for Processing residues and/or Post-consumer feedstock requirements per Standard 2 and EU RED	12
5.11 Summary of evaluation activities for chain of custody system per Standard 4	12
5.12 Summary of evaluation activities for collection and communication of data per Standard 5	12
5.13 Summary of audit findings for competency of involved personnel	13
5.14 Summary of audit findings for GHG methodology per Standard 6 (if applicable)	13
6 Detailed evaluation of BP's Supply Base Evaluation (if applicable)	14
6.1 Overview of BP's risk assessments and mitigation measures including EU RED scope	14
6.2 CB evaluation of specified risk indicators and mitigation measures	14

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:	Igor Miilvee
Audit team members:	Igor Miilvee
Name of the Company:	Drax Power Limited
Company legal address:	New Rd, Drax, Selby, YO8 8PH North Yorkshire, United Kingdom
Company contact for SBP:	Claire Sedgwick
Company contact email:	Claire.Sedgwick@drax.com
Company website:	www.drax.com
Date of installation:	01 Jan 2004
SBP Certificate Code:	SBP-01-43
Date of certificate issue:	10 Oct 2026
Date of certificate expiry:	09 Oct 2031
Audit closing meeting date:	09 Jul 2026
Audit cycle:	Re-assessment

2 Audit conclusions

2.1 Certification decision

Based on the auditor's recommendation and the Certification Body's technical review, the following certification decision is taken:	
Certification decision:	Certification approved
Certification decision by (name of the person):	Pilar Gorria
Date of decision:	22 Sep 2026
Other comments:	N/A

2.2 Open non-conformities and observations

NC number 9420	NC Grading: Observation
Standard:	SBP Standard 4: Chain of Custody v2.0
Requirement:	<p>1.12 The Organisation shall maintain accurate, complete, up to date and accessible records and reports covering all applicable SBP requirements applicable to the certificate scope, including at least the following: – training records, – subcontractors, – suppliers, – purchases, – determination of conversion rates, – sales, – material accounting including an annual summary, – stakeholder comments, feedback and complaints, – handling of non-conforming products, – record to support Standard 5 requirements, and – internal audit reports. Note: the DTS can be referenced for available records where applicable.</p> <p>N/A N/A N/A</p>
Description of Non-conformance and Related Evidence:	
<p>The Organisation is encouraged to begin preparations for the transition to SBP Standards v2.1, which become effective on 29 July 2026, with the transition period concluding on 28 October 2027. As the updated standards and supporting documentation are now publicly available from SBP, early review of the revised requirements would facilitate timely identification of any necessary changes to the management system, procedures, and personnel training arrangements. The Organisation should consider undertaking a gap assessment against SBP Standards v2.1 and developing a transition plan to support implementation within the published transition timeframe.</p>	
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

NC number 9422		NC Grading: Observation
Standard:	SBP Standard 4: Chain of Custody v2.0	
Requirement:	<p>1.5 The Organisation shall maintain documented procedures (i.e., work instructions or equivalent documentation), covering all relevant requirements within the scope of the certificate and reflecting current Organisational activities. Documented procedures shall include at a minimum: – training, – internal audits, – record-keeping, – stakeholder engagement, including management of comments and complaints, – handling non-conforming products and non-appropriate documentation, – material receipt: input/purchasing, – material accounting, – sales transactions: output/sales, – claims, – business integrity, social, and health and safety requirements, – subcontracting activities/subcontractors (where applicable), and – collection and communication of data for energy and carbon balance calculations.</p> <p>N/A</p> <p>N/A</p> <p>N/A</p>	
Description of Non-conformance and Related Evidence:		
<p>The Organisation uses the MD platform to manage supplier onboarding and certification due diligence. The sampled suppliers and certification claims were appropriately approved, and no shortcomings were identified in the onboarding or due-diligence controls applied before claims were accepted. However, the records provided did not present the historical certification status of all suppliers active during the audit period across FSC, PEFC and SBP in one readily reviewable overview. Some supplier/pellet-plant entries in the MD export showed current workflow statuses such as “in progress” or “pending”, while historical approval and certification information was retained through the platform’s archival functionality. As an opportunity for improvement, the Organisation should consider maintaining or generating an audit-period supplier overview that clearly demonstrates each active supplier’s applicable certification status and validity for the relevant period and certification scheme.</p>		
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

NC number 9421		NC Grading: Minor
Standard:	SBP Standard 4: Chain of Custody v2.0	
Requirement:	1.33 Record of names and contact details of subcontractors with scope of activities shall be maintained and kept up to date by the Organisation. N/A N/A	
Description of Non-conformance and Related Evidence:		
At the time of audit, the Organisation used several external storage and port-handling locations for SBP-claimed material, including Hull, Immingham, Liverpool, Port of Tyne, Elsham, Goole, GrainCo and Staithes Road. The initial external-site overview did not fully evidence a controlled subcontractor register with all relevant details such as legal entity, company number, contact, outsourced activity, certification scope, claim type, segregation method, inspection status and CB access notes.		
Timeline for Conformance:	Prior to (re)certification	
Evidence Provided by Company to close NC:	The Organisation provided an updated external storage-site register, version 1.1, covering site name, contractor legal identity/company number, address, contact, outsourced activity, status, contract reference, storage capacity, certificate scope, claim type, segregation method, internal-audit frequency, last inspection date, CB access notes and reference to signed agreement / site procedures.	
Findings for Evaluation of Evidence:	The updated register is sufficient to demonstrate control of outsourced storage and port-handling locations, subject to continued maintenance. The minor NCR was closed.	
NC Status:	Closed	
Original Due Date:	N/A	
Closing Date:	2026-09-22	
Upgrade Date:	N/A	
Update Date:	N/A	

2.3 Actions taken by Organisation Prior to Report Finalisation

Additional information was shared regarding storage sites and suppliers.

2.4 Notes for the next Audit

Audit period is 01JUL26 to 30 JUN27, 3Q26 to 2Q27, 12 months. For audit planning, consider (sampling) the external sites aggregated in the overview of external sites exhibit.

3 Scope of the audit and SBP certificate

Scope item	Check all that apply to the Certificate scope
Primary activity	End User
Secondary activity	Trader
Approved Standards	SBP Standard 4: Chain of Custody v2.0; SBP Standard 5: Collection and Communication of Data v2.0; Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1; Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413
Product Group IDs	☐ Forest feedstock (1A) ☐ Trees outside forest (TOF) - Urban and landscape feedstock (2A) ☐ Trees outside forest (TOF) - Agricultural land feedstock (3A) ☐ Processing residues feedstock (4A) ☐ Post-consumer feedstock (5A) ☒ Other (please specify) WB 1.1 Wood pellet
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 1.1 Wood pellets
Feedstock origin (countries):	
SBP-endorsed Regional Risk Assessments used:	Not applicable
Public link: https://sbp-cert.org/documents/standards-documents/risk-assessments/	
Chain of custody system	☒ Physical separation ☐ Mass balance
Outsourcing	Yes
Changes in the scope	Reassessment.

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.

Drax Power Ltd is a UK energy producer operating Drax Power Station near Selby, with the office and power plant located at the same site. The Organisation procures wood pellets internationally, including from North America, Europe and other regions, for use in biomass power generation and related trading activities. The Organisation's role in the SBP supply chain is as an End-user / Trader with physical possession, receiving SBP-claimed biomass through DTS and, where applicable, handling material through approved external storage and port-handling locations. Inputs are primarily wood pellets. Outputs include consumed biomass for renewable power generation and, where applicable, SBP-claimed sales/trades. The certificate scope includes SBP Chain of Custody and EU RED / REDIII sustainability requirements.

3.2 Site details

Legal entity name	Address	Site Activity	Visited during the audit
Drax Power Limited	Selby, North Yorkshire YO8 8PH	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.

Drax Power Ltd operates an SBP Chain of Custody system for wood pellets. The CoC system covers receipt, storage, consumption and, where applicable, trading of SBP-claimed biomass. SBP claims are received and transferred through DTS, with internal checks against invoices, shipping documents, PBIDs/SDIs and relevant GHG data. The Organisation uses a transfer / volume balance approach to maintain the identity of claims, volumes, Product Groups and batch-specific sustainability characteristics. Where material from different suppliers is physically combined, batch-level information is retained in the Organisation's systems to ensure the same claim type and eligible quantity are not exceeded on output. Drax may also store biomass at approved external storage and port-handling locations. For such material, physical segregation is applied, supported by site registers, signed agreements, stock accounting, weighbridge records and inspection controls. The established Product Group is: Wood pellets / biomass pellets — SBP-compliant, and where applicable SBP EU RED-compliant.

4 Specific objective of the audit

The specific objective of this reassessment was to confirm that the Organization's management system can ensure that all requirements of the specified SBP Standards are implemented across the entire scope of certification.

The scope of the evaluation covered:

- Review of the Organisation's management procedures, including requirements designated in the applicable SBP scope;
- Review of FSC and PEFC system control points, analysis of the existing FSC and PEFC CoC system;
- Interviews with responsible staff;
- Review of the records and calculations;
- GHG data collection analysis;
- DTS records;
- Stakeholder Engagement Plan;
- Business integrity;
- Evaluation of compliance with the SBP Framework for meeting EU RED (REDIII) requirements.

5 Evaluation process

5.1 Timing and duration of evaluation activities

Audit Level of Effort (LoE)		
Activity	Auditors	Auditor hours
1. Preparation	IM	6.0
2. On-site (excl. travel time)	IM	14.0
3. Report writing	IM	8.0

5.2 Auditor team qualification

Auditor qualification		
Auditor name	Role	Qualification
Igor Miilvee (IM)	Audit team leader	Preferred by Nature Certification, FSC, PEFC and SBP specialist and lead auditor. BSc in Ecology and Biodiversity Conservation and MSc in Biochemistry and Molecular Ecology. Has worked in Estonian state and private environmental research institutions in the fields of industrial GHGs and air pollutant monitoring, climate change adaptation and forest monitoring. Auditing experience from Estonia, Finland, Ukraine, Germany, UK.

5.3 Description of evaluation activities

The reassessment audit was conducted on-site on **29–30 June 2026** at Drax Power Station, Selby, and selected outsourced storage locations. The audit criteria included **SBP Standard 4 v2.0**, **SBP Standard 5 v2.0**, **Instruction Document 5E v2.1**, and **Instruction Document EU RED: Bridging Requirements for Meeting Directive EU/2023/2413**.

The first audit day focused on the CoC management system, documented procedures, responsibilities, training, internal audit, SBP critical control points, accounting/claims controls, sales processes, DTS, SREG, mass balance, energy and carbon reporting, REDIII/EU RED procedures, outsourcing controls and sample document verification.

The second audit day included a site tour covering reception, storage and processing at Drax Power Station, followed by visits to outsourced biomass storage locations, including **Staithes Road, JHP Storage and NW Trading (Humber) Ltd**.

Audit methods included triangulation through document review, interviews with personnel responsible for CoC, biomass compliance, trading, logistics and claims, transaction sampling, review of DTS exports, SBP log records, supplier/pellet-plant approval data, volume summaries, internal audit records, external storage agreements and the updated external-site register.

The closing meeting was held on **09 July 2026**. One minor NCR and two observations were raised under SBP Standard 4 v2.0, the minor NCR was closed following review of corrective evidence.

Impartiality Commitment: Preferred by Nature commits to using impartial and qualified auditors. Clients are encouraged to contact Preferred by Nature if any concerns regarding auditor impartiality arise.

For more information, see our Impartiality Policy: <https://www.preferredbynature.org/library/document/impartiality-policy>

5.4 List of forest management units and feedstock suppliers visited

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

N/A - The Organisation's role in the SBP supply chain is as an End-user with occasional Trader with physical possession.

5.5 Describe audit sampling methodology used

Audit sampling was applied using a risk-based approach, considering changes to the management system, updated SBP/EU RED requirements, external storage use, supplier approval status, DTS claim controls, mass balance, SREG applicability and GHG/energy data. The internal audit population included 238 trades, from which the Organisation sampled 24 transactions. For the external audit, a further sample was taken from these 24 internal-audit samples using the square-root approach, resulting in 5 transactions selected for detailed external verification. The 5 sampled transactions were checked against DTS records, SBP log entries, invoices, shipping documents, PBIDs/SDIs, claim status, GHG scope endpoint information and, where relevant, SREG requirements. Sampling also included review of CoC procedures, training records, supplier/pellet-plant approval data, internal audit records, volume summaries and external storage controls. The Organisation's external-site register identified 8 active external locations used for SBP-claimed material: Hull, Immingham, Liverpool port, Port of Tyne, Elsham, Goole, GrainCo and Staithes Road. These included both port-handling locations and dedicated storage locations. The square root of 8 external locations resulted in a sample of 3 sites. The physical site sample focused on actual outsourced storage locations rather than port-handling locations, as these were considered higher risk for SBP traceability due to longer-term custody, stock accounting, segregation and loading/unloading controls. The sites visited were Staithes Road, JHP Storage / Elsham and NW Trading / Goole, representing 3 of the 4 dedicated storage locations listed in the external-site register. Port-handling locations, including Hull, Immingham, Liverpool port and Port of Tyne, were reviewed through documentation and the external-site register but were not visited during this audit. These locations should be considered for physical sampling in the next audit cycle to maintain coverage across the full external-site universe. Staff interviews were conducted with personnel responsible for SBP system management, biomass compliance, trading, logistics, claim checks, DTS/SBP log maintenance and external storage controls.

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 Organisation has a well-structured SBP Chain of Custody system, supported by documented procedures, defined responsibilities, training, internal audit, supplier/pellet-plant approval controls and transaction-level claim verification. SBP claims are checked through DTS, SBP log records, invoices, shipping documents, PBIDs/SDIs and relevant GHG/SREG information.

Additional strengths include a systematic internal audit process, and improved control of external storage and port-handling sites through an updated site register and signed storage agreements.

Weaknesses: No systemic weaknesses were identified. One minor NCR related to completeness of the external-site register was raised and closed during the audit process. Two observations remain, relating to continued demonstration of supplier/pellet-plant approval status at the time of transactions and preparation for transition to SBP Standards v2.1.

5.9 Summary of evaluation activities for robustness of the Supply Base Evaluation

☒ N/A – Standard 1 not in the scope of the evaluation

5.10 Summary of evaluation activities for Processing residues and/or Post-consumer feedstock requirements per Standard 2 and EU RED

☒ N/A – processing residues and/or post-consumer feedstock not used.

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

The Organisation has implemented an SBP Chain of Custody system in accordance with **SBP Standard 4 v2.0**. The system covers receipt, storage, consumption and, where applicable, trading of **wood pellets** with SBP claims. The Organisation also maintains FSC and PEFC Chain of Custody systems for biomass within the certificate scope.

The CoC system was evaluated through review of documented procedures, SBP claims work instructions, training records, internal audit records, supplier approval records, DTS exports, SBP log records, volume summaries and sampled transaction documentation. SBP claims are received and communicated through **DTS**, with checks against invoices, shipping documents, PBIDs/SDIs, GHG scope endpoint data and SREG applicability where relevant.

The Organisation uses volume balance / claim control records to maintain traceability of volumes, claims and batch-specific sustainability characteristics. Where biomass is stored or handled externally, physical segregation is applied. External storage and port-handling locations are controlled through signed agreements, stock accounting, weighbridge records, inspection arrangements and an updated external-site register.

The established SBP Product Group is **wood pellets / biomass pellets**. The audit confirmed that procedures are in place for non-conforming products, including exclusion of uncertified or incorrectly claimed material from the SBP claim stream. One minor NCR related to the external-site register was raised and closed during the audit process.

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

The Organisation has established controls for collecting and communicating energy and carbon data under **SBP Standard 5** and **ID5E**. Data checks were verified through sampled DTS records, SBP log entries, PBIDs/SDIs, GHG scope endpoint information and SREG applicability.

The Organisation uses supplier-declared PBIDs and associated SAR data, and completes **SREGs** where Drax-owned transport or storage adds emissions beyond the supplier's declared scope endpoint.

The system was found adequate for completeness and accuracy of the reviewed energy and carbon data.

5.13 Summary of audit findings for competency of involved personnel

Overall responsibility for SBP compliance is assigned to competent personnel within Energy Frameworks Team, with supporting roles in trading, logistics, operational support, business ethics and claims management. The audit confirmed that responsibilities are defined in the Organisation's CoC procedure and supported by work instructions for SBP claims, DTS checks, PBID/SDI verification and SREG applicability.

Competency was evaluated through interviews, review of training records, internal audit records and sampled transaction checks. Personnel demonstrated adequate knowledge of SBP Standard 4, Standard 5, DTS, claim verification, supplier approval, external storage controls and EU RED / REDIII-related requirements.

The training system was found adequate, with FSC, PEFC and SBP Chain of Custody training provided to relevant personnel. No competency-related non-conformities were identified.

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