



Compliance with the SBP Framework: Public Summary Report

Preferred by Nature OÜ
Evaluation of BIOLACQ ENERGIES

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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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:	BIOLACQ ENERGIES
Company legal address:	Zone INDUSLACQ RD 817, 64170 Lacq, France
Company contact for SBP:	Nicolas Paille
Company contact email:	nicolas.paille@engie.com
Company website:	
Date of installation:	
SBP Certificate Code:	SBP-10-26
Date of certificate issue:	18 Mar 2024
Date of certificate expiry:	17 Mar 2029
Audit closing meeting date:	22 Jan 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:	23 Mar 2026
Other comments:	N/A

2.2 Open non-conformities and observations

NC number 8559 copied from 5179 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. N/A N/A 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:	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:	Updated procedures do not contain the mandatory instructions cited under requirement 1.20 of SBP Standard 4. Minor NC 2025-003140 is upgraded to Major NC with an April 22nd, 2026, deadline (closing meeting date + 3 months).
NC Status:	Open

NC number 8573 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. N/A

	N/A 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 8556 copied from 5176 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. N/A 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 1.14-1.17. This NC is closed. For 1.18, see new minor NC issued.
NC Status:	Closed

NC number 8557 copied from 5177 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. N/A 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 8558 copied from 5178 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. N/A N/A
Description of Non-conformance and Related Evidence:	
The Organisation conducted an internal audit (see Exh. S03). The findings of the internal audit are recorded. However, the internal auditor, Christelle Faget has also responsibilities in the certification system of the Organisation (see Exh. S04) and therefore should 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 II - BIOLACQ 2025.xlsx Discussions with staff
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 8560 copied from 5180 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. N/A 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, ensuring reference only to V2 of the SBP 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 NCRs

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
Product Group IDs	☒ Forest feedstock (1A) ☐ Trees outside forest (TOF) - Urban and landscape feedstock (2A) ☐ Trees outside forest (TOF) - Agricultural land feedstock (3A) ☐ Processing residues feedstock (4A) ☐ Post-consumer feedstock (5A) ☐ Other (please specify)
SBP Feedstock types	☐ SBP Compliant; ☒ SBP Controlled
Includes Supply Base Evaluation (SBE)	No
Includes EU RED Scheme	Yes
Includes EU RED Supply Base Evaluation (SBE)	No
Products	WB 2.1 Wood chips
Feedstock origin (countries):	France
SBP-endorsed Regional Risk Assessments used: Public link: https://sbp-cert.org/documents/standards-documents/risk-assessments/	Not applicable
Chain of custody system	☒ Physical separation ☐ 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 Biolacq Energies project is a biomass-fired cogeneration plant with an annual consumption of 160,000 tonnes. Biolacq Energies, a subsidiary of ENGIE Cofely, supplies steam and electricity to adjacent facilities and neighbourhood. The EP is buying all feedstock as already SBP EU RED-Controlled from its sister company ENGIE SOVEN. All feedstock purchased is consumed on site by the EP for its steam and energy production.

3.2 Site details

Legal entity name	Address	Site Activity	Visited during the audit
Biolacq Energies	RUE THOMAS EDISON 33610 CANEJAN	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.

This Energie Producer (EP) doesn't have its own CoC system. This EP is managed by ENGIE Energie Solutions, the sister company of ENGIE/SOVEN, certified to PEFC (<https://pefc.org/find-certified/details?cbResetParam=1&CID=C-1G7RDC&LID=L-C3MPUI&EID=E-XM9WN7>) and SBP EU RED compliant (<https://sbp-cert.org/certificate-holders/#4783>). All purchases received by the EP have been certified as SBP EU RED Compliant (compliant or controlled) by ENGIE/SOVEN. IT system is shared and as well as the management system. Management team of both organization meets regularly and certification updates are discussed.

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 the DTS;
- RED system implementation (REDII).

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	Auditor	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, Energy Producers limited assurance regime is implemented due to its low risk profile. This includes remote audits and sampling regime. Low risk is 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 $0.8 * \text{Square root}(x)$, 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

BIOLACQ ENERGIES second annual surveillance audit was carried remotely on January 22nd, 2026.

The audit started with an opening meeting with attendance from the key staff. The schedule of the audit was discussed. Then the auditor proceeded by reviewing the evidence listed in Section 3.1 above, such as procedures, management system, accounts and records, SBP RED procedures, DTS transactions, and interviews with key staff.

On the same day, the auditor and the BP's team conducted the closing meeting where the preliminary findings were presented and the next steps discussed.

5.4 List of forest management units and feedstock suppliers visited

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

N/A - Organization is an end user receiving only SBP-Claims feedstock

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 recordkeeping 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

☒ 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

Traceability documentation was reviewed, following a sampling by the auditor. On-site visit was conducted visiting weighbridge and unloading areas, along with interviews of feedstock handling employees.

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 its supplier via DTS and internal database (DDS system). These records include information on types of biomass, energy and carbon in the SAR and SREG documents, 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.

5.13 Summary of audit findings for competency of involved personnel

In general a few management persons share responsibilities for maintaining the management system, ensure traceability and data communication. During the assessment 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

REDII.

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