Compliance with the SBP Framework: Public Summary Report

Preferred by Nature OÜ Evaluation of BIOFORGA

NCR-verification audit

Sustainable Biomass Program
sbp-cert.org



Completed in accordance with the CB Public Summary Report Template Version 2.0

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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Table of contents

1 Overview **3**

2 Audit conclusions **4**

2.1 Certification decision 4

2.2 Open non-conformities and observations 4

2.3 Closed non-conformities 8

2.4 Actions taken by Organisation Prior to Report Finalisation 8

2.5 Notes for the next Audit 9

3 Specific objective of the audit **10**

4 Evaluation process **11**

4.1 Timing and duration of evaluation activities 11

4.2 Auditor team qualification 11

4.3 Description of evaluation activities 11

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:	Gabriel Poveda
Audit team members:	Lennart Holm
Name of the Company:	BIOFORGA
Company legal address:	RUA NETOS, 33, 36780 A GUARDA (PONTEVEDRA), Spain
Company contact for SBP:	Juan Manuel Pérez Rodríguez
Company contact email:	bioforga@gmail.com
Company website:	http://www.bioforga.com
Date of installation:	
SBP Certificate Code:	SBP-10-89
Date of certificate issue:	30 Jul 2024
Date of certificate expiry:	29 Jul 2029
Audit closing meeting date:	30 Jun 2026
Audit cycle:	NCR-verification 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):	Pilar Gorria
Date of decision:	30 Jun 2026
Other comments:	N/A

2.2 Open non-conformities and observations

NC number 8907	NC Grading: Minor
Standard:	SBP Standard 1: Feedstock Compliance v2.0
Requirement:	N/A N/A 4 Feedstock sourcing benefits people and communities 41 Decent working conditions are provided, and labour rights are safeguarded. 4110 Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
Description of Non-conformance and Related Evidence:	
The risk associated with this indicator is classified as low for forest improvement and utilization activities conducted under the responsibility of Bioforga and specified for activities carried out by suppliers in private forests. Field verification was limited to one worksite directly managed by the certificate holder (CH), as there were no other ongoing works directly managed by the CH staff and machinery available to be audited at the time of the audit. Other FMUs visited during the audit were operated by subcontractors, and safeguards to protect workers' health and safety were in place at those sites. During the site visit to the FMU managed by the CH, it was observed that the forwarder in operation was not equipped with a fire extinguisher or a first aid kit. These were also not available in the vehicle or within the immediate vicinity of the worksite. This constitutes a failure to ensure the availability of essential health and safety equipment at operational sites. At the central offices of the CH, it was verified that first aid kits and fire extinguishers are provided to workers and made available for operational use. Records also confirmed that the worker involved had received the appropriate occupational health and safety training through the company's risk prevention program. Additionally, the organization provided photographic evidence demonstrating that the remaining machinery operated by the CH is properly equipped with first aid kits and fire extinguishers.	
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

NC number 8908	NC Grading: Observation
Standard:	SBP Standard 1: Feedstock Compliance v2.0
Requirement:	N/A N/A 1 Feedstock is legally sourced 11 Operators and operations are legal. 113 Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.
Description of Non-conformance and Related Evidence:	
The EU has developed new regulation that will replace the EUTR and introduces a number of considerations that are particularly relevant for the organisation. The organisation should therefore review its obligations under the EUDR, which will become mandatory as of 30 December 2026.	
Timeline for Conformance:	N/A
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

NC number 8909	NC Grading: Observation
Standard:	SBP Standard 4: Chain of Custody v2.0
Requirement:	1.9 Records of training participants and content shall be maintained. N/A N/A N/A
Description of Non-conformance and Related Evidence:	
During the period, the CH attended training on EUDR and PEFC RED III, as well as a SURE webinar; however, no SBP-specific training was completed. Records for the CH trainings (EUDR/PEFC RED III/SURE) were not available; although these trainings are not SBP-specific, they are relevant to the SBP requirements and should be recorded.	
Timeline for Conformance:	N/A
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

NC number 8910	NC Grading: Observation
Standard:	SBP Standard 2: Feedstock Verification v2.0
Requirement:	3.6.2 If these changes affect the Risk Assessment conclusions, the Organisation shall alter the required RMP of an SBE, which shall result in an immediate review and, if deemed necessary, revision of the SBE by the Organisation. Such changes may include, but are not limited to: – new legislation and/or jurisdictional changes, – new feedstock sources being proposed, – new suppliers and/or contractors being used, – identification of new sustainability issues relevant to the SBP Standard, and – failure of any RMM within the RMP to address the specified risks. N/A N/A N/A
Description of Non-conformance and Related Evidence:	
Bioforga has a management system which will ensure that changes that affects the Risk Assessment does trigger alterations to the RMP and SBE, as applicable, as documented in the annual update of the SBR. A revised version of the FSC Spanish NRA is scheduled for imminent publication, and it has been adopted by the CH as a reference. Therefore, the CH should be aware of the potential impact that the NRA could have on the current evaluation. Furthermore, it should be noted that some of the references utilised in the SBE are more than five years old. The CH should provide justification for the continued validity of these references, or alternatively, to utilise more updated references.	
Timeline for Conformance:	N/A
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

2.3 Closed non-conformities

NC number 8616 copied from 7172	NC Grading: Major
Standard:	SBP Standard 2: Feedstock Verification v2.0
Requirement:	8.4 The Organisation shall allow stakeholders at least one month to provide feedback before the SBE is finalised. N/A N/A
Description of Non-conformance and Related Evidence:	
Timeline for Conformance:	Other
Evidence Provided by Company to close NC:	SEP register (Partes_interesadas_SBP_Bioforga.xlsx) documenting the stakeholder consultation conducted 02–03/06/2026 with five contacts (two forestry companies, two consultancies, one auditor in Galicia/Asturias), including organisation names, dates, summary of communication, responses received, and actions taken; supplemented by an expanded stakeholder contact list (Lista Contactos) covering additional stakeholder categories. Updated SBR Annex 2 — EU RED III Supply Base Evaluation (RED_III_Supply_Base_Report-BIOFORGA-2026_final.docx), reflecting the completed deadwood indicator and the reinforced justification for the 50-hectare clear-cut threshold for eucalyptus.
Findings for Evaluation of Evidence:	The audit team, in discussion with the auditor who originally issued this NC, concludes that the evidence provided is sufficient to close the non-conformity. It is noted that the Organisation's original stakeholder consultation in support of the SBE update was not conducted within the required timeframe and did not generate any documented feedback at the time. Given this, the audit team considered it appropriate and proportionate for the Organisation to obtain additional feedback from relevant stakeholders and field experts as a corrective measure, in order to demonstrate that the technical content of the SBE — specifically the deadwood retention threshold and the 50-hectare clear-cut threshold — has now been subject to external scrutiny. The consultation record submitted demonstrates that this feedback was sought and obtained, with no substantive objections raised to the conclusions of the SBE, and the updated SBR Annex 2 confirms that this feedback was incorporated into the finalised document. The Organisation has further committed to formalising a minimum one-month stakeholder consultation period within its SBE update procedure to prevent recurrence. This procedural commitment shall be verified for effective implementation during the next surveillance audit; failure to demonstrate a documented, time-compliant consultation process at that time may result in re-opening or upgrading of this non-conformity. On this basis, the audit team is satisfied that the intent of Requirement 8.4 has now been reasonably met.
NC Status:	Closed

2.4 Actions taken by Organisation Prior to Report Finalisation

The organisation has provided SEP register (Partes_interesadas_SBP_Bioforga.xlsx) documenting the stakeholder consultation conducted 02–03/06/2026 with five contacts (two forestry companies, two consultancies, one auditor in Galicia/Asturias), including organisation names, dates, summary of communication, responses received, and actions taken; supplemented by an expanded stakeholder contact list (Lista Contactos) covering additional stakeholder categories.Updated SBR Annex 2 — EU RED III Supply Base Evaluation (RED_III_Supply_Base_Report-BIOFORGA-2026_final.docx), reflecting the completed deadwood indicator and the reinforced justification for the 50-hectare clear-cut threshold for eucalyptus.

2.5 Notes for the next Audit

Verify effectiveness of the corrective action items for closing of open NCR

3 Specific objective of the audit

The specific objective of this evaluation was to verify the effectiveness of the corrective actions implemented by Bioforga in response to the non-conformities raised during the previous surveillance audit, specifically:

- NC 8616 (Major) — SBP Standard 2, Requirement 8.4: verification that the Organisation has formalised and effectively implements a minimum one-month stakeholder consultation period within its SBE update procedure, in order to confirm that this NC can remain closed on a sustained basis.

This evaluation did not constitute a full surveillance audit and was limited in scope to the verification of the evidence and corrective actions submitted by the Organisation in relation to the above non-conformities.

4 Evaluation process

4.1 Timing and duration of evaluation activities

Audit Level of Effort (LoE)		
Activity	**Auditors**	**Auditor hours**
1. Preparation	Gabriel Poveda Portilla	0.5
3. Report writing	Gabriel Poveda Portilla	0.5

4.2 Auditor team qualification

Auditor qualification		
Auditor name	**Role**	**Qualification**
Gabriel Poveda	Lead auditor (witness audit)	Forest engineer. I have worked in the forest-based sector since 2008. I am an FSC and PEFC Chain of Custody auditor, an FM FSC auditor, a former Rainforest Alliance SC auditor, and a SBP auditor in training. I have worked for Preferred by Nature as a Supply Chain Specialist since 2020.
Lennart Holm	Witness auditor	Lennart is a Biomass and Forestry Specialist with Preferred by Nature, with 34 years of experience working in the forest sector, 26 years of international work experience, 17 years of international auditing experience. Lennart has participated in over 100 FSC forest management audits and has conducted over 700 Chain of Custody audits, for various CBs. Lennart has developed, maintained and audited many different Forest Managements in Sweden, Norway, Denmark, Canada, USA, Portugal and Spain. Lennart is a Registered Professional Forester in the province of British Columbia.

4.3 Description of evaluation activities

This evaluation was conducted as a desk-based review, without an on-site visit, as it was limited in scope to the verification of corrective actions submitted by the Organisation in relation to NC 8616 (Major) raised during the previous surveillance audit.

For NC 8616, the audit team reviewed the documentary evidence submitted by the Organisation, including the stakeholder consultation register (SEP), the updated stakeholder contact list, and the updated SBR Annex 2 (EU RED III Supply Base Evaluation). The review assessed whether the stakeholder consultation conducted addressed the technical content originally flagged as deficient (deadwood retention threshold and 50-hectare clear-cut threshold for eucalyptus), and whether the Organisation had formalised a procedural commitment to a minimum one-month stakeholder consultation period for future SBE updates, as required to address the root cause of the non-conformity.