Compliance with the SBP Framework: Public Summary Report

Preferred by Nature OÜ
Evaluation of SOCIETE DE DISTRIBUTION DE CHALEUR DE BAGNOLET - S.D.C.B. SAS

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:	ERROR: Works only for SBR or PSR form. Please alter the function by adding more tables, or by dynamic sql
Name of the Company:	SOCIETE DE DISTRIBUTION DE CHALEUR DE BAGNOLET - S.D.C.B. SAS
Company legal address:	5 Av. des Roses, 93170 Bagnolet, France
Company contact for SBP:	Xavier Gentilhomme
Company contact email:	xavier.gentilhomme@engie.com
Company website:	
Date of installation:	22 Jun 2015
SBP Certificate Code:	SBP-10-25
Date of certificate issue:	18 Mar 2024
Date of certificate expiry:	17 Mar 2029
Audit closing meeting date:	29 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 not approved
Certification decision by (name of the person):	Pilar Gorría
Date of decision:	27 Mar 2026
Other comments:	N/A

2.2 Open non-conformities and observations

NC number 8536 copied from 4847	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:	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 April 29th, 2026, deadline (closing meeting date + 3 months).
NC Status:	Open
Original Due Date:	N/A
Closing Date:	N/A
Upgrade Date:	N/A
Update Date:	N/A

NC number 8589	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
Original Due Date:	2027-03-27
Closing Date:	N/A
Upgrade Date:	N/A
Update Date:	N/A

2.2 Closed non-conformities

NC number 8532 copied from 4843	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 following a thorough review to ensure its comprehensiveness and effectiveness, ensuring the use of V2 standards. This NC is closed.
NC Status:	Closed
Original Due Date:	2027-03-27
Closing Date:	2026-03-27
Upgrade Date:	N/A
Update Date:	N/A

NC number 8533 copied from 4844	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. N/A 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
Original Due Date:	2027-03-27
Closing Date:	2026-03-27
Upgrade Date:	N/A
Update Date:	N/A

NC number 8534 copied from 4845	**NC Grading: Minor**
Standard:	SBP Standard 4: Chain of Custody v2.0
Requirement:	1.10 The Organisation shall conduct an internal audit, not later than 12 months after the preceding audit (internal or external) for the purpose of evaluating the Organisation's conformance with SBP requirements, considering the size and scope of the Organisation and certificate. Note: An internal audit is not required to be conducted before the external initial certification audit by the CB. N/A N/A
Description of Non-conformance and Related Evidence:	
The Organisation was not able to provide an internal audit report and has not completed an internal audit since its assessment.	
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 2025 SDCB - Rapport audit interne SBP-RED II (1) 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
Original Due Date:	2027-03-27
Closing Date:	2026-03-27
Upgrade Date:	N/A
Update Date:	N/A

NC number 8535 copied from 4846	**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 1.14-1.1.7. This NC is closed. For 1.18, see new minor NC issued.
NC Status:	Closed
Original Due Date:	2027-03-27
Closing Date:	2026-03-27
Upgrade Date:	N/A
Update Date:	N/A

NC number 8537 copied from 4848	**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
Original Due Date:	2027-03-27
Closing Date:	2026-03-27
Upgrade Date:	N/A
Update Date:	N/A

NC number 8538 copied from 4849	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 was not able to provide an internal audit report and has not completed an internal audit since its assessment. No other non-conformity were identified regarding the REDII bridge Instruction Document.	
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 2025 SDCB - Rapport audit interne SBP-RED II (1) 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
Original Due Date:	2027-03-27
Closing Date:	2026-03-27
Upgrade Date:	N/A
Update Date:	N/A

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 5E: Collection and Communication of Energy and Carbon data. v2.1; 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	Transition to version REDIII Organization applies grandfathering clause and RED II is implemented.

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.

Since 1966, the Société de Distribution de Chaleur de Bagnolet (SDCB) has produced and transmitted energy for heating and domestic hot water for many buildings in the city. The Bagnolet heating network has grown and evolved in step with the city's changes. In just a few years, SDCB has carried out a complete transformation of the energy mix, moving from a network mainly composed of fossil fuels, coal and heavy fuel oil to a network with +51% renewable energy, thanks to wood supplemented by gas. Crossing the Louise Michel, La Noue, La Dhuys and Les Malassis districts, the heating network today supplies 17,000 housing equivalents thanks to 20 km of buried pipes. Three boiler rooms with a total installed capacity of 114 MW ensure production. The heating network fully meets the criteria of social and environmental responsibility, by offering local solutions for the sustainable development of its territory.

3.2 Site details

Legal entity name	Address	Site Activity	Visited during the audit
SOCIETE DE DISTRIBUTION DE CHALEUR DE BAGNOLET	5 Av. des Roses Bagnolet, 93170 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 accepted with either SBP-compliant or SBP-controlled claims alongside the SBP-REDII 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;
- 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**
Francois Gambier	Audit team leader	François holds a Master's degree in wood engineering from ENSTIB and a PhD in wood and fibre sciences from the Université de Lorraine. He is a qualified auditor for FSC CoC and PEFC CoC certifications since 2022, and SBP auditor in since 2023. He is Supply Chain Specialist at Preferred by Nature since 2023.

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 * 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

SOCIETE DE DISTRIBUTION DE CHALEUR DE BAGNOLET - S.D.C.B. S first surveillance audit was conducted onsite and this second surveillance audit was conducted remote on January 29, 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, REDII sustainability criteria evaluation.

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 summarized, 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 formalize 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 REDII 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 BBES- Format déclaration élec chaleur 2024 v3 (1).xlsx (Folder Déclaration des GES).
This was reviewed 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