



# Supply Base Report:

## Carbonex

## Second Surveillance Audit

**Sustainable Biomass Program**  
sbp-cert.org



## Completed in accordance with the Supply Base Report Template Version 2.2 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](http://www.sbp-cert.org)

### Document history

|                    |                                |
|--------------------|--------------------------------|
| <b>Version 1.0</b> | <b>Published 26 March 2015</b> |
| <b>Version 2.0</b> | Published 10 August 2023       |
| <b>Version 2.1</b> | Published 15 April 2024        |
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## 1 Overview

|                                          |                                                                                                                                                                                                                                                                                                                                 |
|------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Producer name:</b>                    | Carbonex                                                                                                                                                                                                                                                                                                                        |
| <b>Producer address:</b>                 | Lieudit Cordelon, 10250 Gyé-sur-Seine, France                                                                                                                                                                                                                                                                                   |
| <b>SBP Certificate Code:</b>             | SBP-10-12                                                                                                                                                                                                                                                                                                                       |
| <b>Geographic position:</b>              | 48.029500, 4.439690                                                                                                                                                                                                                                                                                                             |
| <b>Primary contact:</b>                  | Thomas Harcourt,<br>+33 771 559 521,<br>thomas.harcourt@soler-group.com                                                                                                                                                                                                                                                         |
| <b>Company website:</b>                  | <a href="https://soler-group.com/">https://soler-group.com/</a>                                                                                                                                                                                                                                                                 |
| <b>Date report finalised:</b>            | 05 Sep 2025                                                                                                                                                                                                                                                                                                                     |
| <b>SBR reporting period from:</b>        | 01 Aug 2024                                                                                                                                                                                                                                                                                                                     |
| <b>SBR reporting period to:</b>          | 31 Jul 2025                                                                                                                                                                                                                                                                                                                     |
| <b>Name of the Certification Body:</b>   | Preferred by Nature OÜ                                                                                                                                                                                                                                                                                                          |
| <b>Certification Body Approval date:</b> | 31 Oct 2025                                                                                                                                                                                                                                                                                                                     |
| <b>SBP Standard(s) used:</b>             | 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 |
| <b>Feedstock origin (countries)</b>      | France (FR1, FRB, FRC, FRD, FRE, FRF, FRG, FRI, FRK, FRL)                                                                                                                                                                                                                                                                       |
| <b>Weblink to Standard(s) used:</b>      | <a href="https://sbp-cert.org/documents/standards-documents/standards">https://sbp-cert.org/documents/standards-documents/standards</a>                                                                                                                                                                                         |

## 2 Description of the Biomass Producer and the Supply Base

### 2.1 Description of the company

Carbonex (Groupe SOLER) is a pioneering French company converting locally sourced wood into biocarbon, electricity, and heat using internally developed pyrolysis process. The company has been operating since 2012, the company delivers high-efficiency charcoal and renewable energy while significantly reducing CO<sub>2</sub> emissions and supporting sustainable forestry in France.

**Products included in the scope of SBP Certification:** WB 2.1 Wood chips

**Number of employees:** 73

**Annual maximum production capacity (metric tonnes):** 30000

**Number of direct feedstock suppliers:** 44

**Approximate number of feedstock sub-suppliers:** 5

### Description of the chain-of-custody and upstream supply chain:

Our upstream supply is from French hardwood forests comprised of hardwoods such as beech, oak, hornbeam sourced under ONF and private forest contracts and transported by local transport companies as well as via the suppliers own transport. Upon reception, lots are weighed and identified by origin and species, then crushed and dried using heat from the process. Wood is carbonised in proprietary kilns, the pyrolysis gases feed a cogeneration plant that provides drying heat and electricity exported to the grid. The finished charcoal is packed and screened, packaging carries origin and certification marks, PEFC chain-of-custody, Origine France Garantie, Bois Français; some lines also reference ONF supply. End-to-end traceability is achieved via PEFC CoC procedures, on-pack origin disclosure, and third-party field audits by Earthworm Foundation's Charcoal Control System. When selling products which require registration under RED legislation, each expedition is registered in the SBP DTS system.

### 2.2 Detailed description of the Supply Base

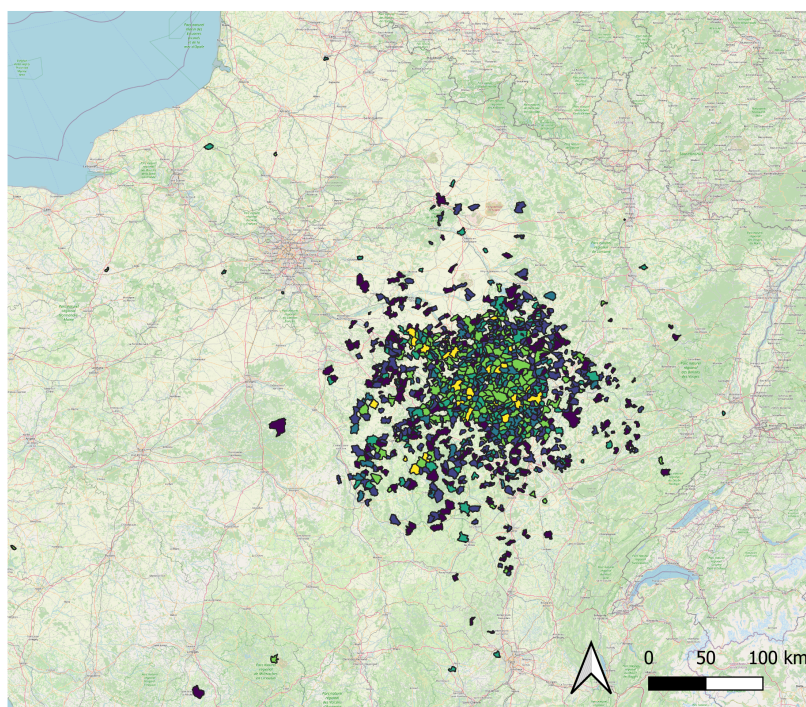
*Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.*

*Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.*

*Annex 2 is generated if EU RED SBE is in the scope for each country separately.*

|                                                                       |                                                           |
|-----------------------------------------------------------------------|-----------------------------------------------------------|
| <b>Country</b>                                                        | France                                                    |
| <b>Area/Region</b>                                                    | FR1, FRB, FRC, FRD, FRE, FRF, FRG, FRI, FRK, FRL          |
| <b>Exclusions</b>                                                     | FRY, FRM, FRJ, FRH                                        |
| <b>Feedstock types</b>                                                | Primary feedstock, Processing residues                    |
| <b>Feedstock Product Groups</b>                                       | Forest feedstock (1A), Processing residues feedstock (4A) |
| <b>Feedstock inputs</b>                                               | SBP Controlled feedstock                                  |
| <b>Is the forest managed to supply energy and non-energy markets?</b> | Yes - Majority                                            |

|                                                                                                                                                  |                                                                                            |
|--------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| <b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b> | Yes - Majority                                                                             |
| <b>Risk assessment(s)</b>                                                                                                                        | N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme |
| <b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>                                                |                                                                                            |
| Not applicable                                                                                                                                   |                                                                                            |
| <b>Feedstock types included in SBE:</b>                                                                                                          | N/A                                                                                        |
| <b>Includes EU RED SBE:</b>                                                                                                                      | No                                                                                         |
| <b>Includes EU RED II SBE grandfathering</b>                                                                                                     | Yes                                                                                        |
| <b>Includes EU RED TOF:</b>                                                                                                                      | No                                                                                         |
| <b>Includes EU RED II TOF grandfathering</b>                                                                                                     | No                                                                                         |
| <b>Size of Supply Base area (million ha):</b>                                                                                                    | 43.5329                                                                                    |
| <b>Map(s) of the Supply Base area:</b>                                                                                                           |                                                                                            |



Carbonex wood supply  
Carbonex wood supply S24-S25

- 10 - 10<sup>2</sup>
- 10<sup>2</sup> - 10<sup>3</sup>
- 10<sup>3</sup> - 10<sup>4</sup>
- 10<sup>4</sup> - 10<sup>5</sup>
- 10<sup>5</sup> - 10<sup>6</sup>
- 10<sup>6</sup> - 10<sup>7</sup>

OpenStreetMap

## 2.3 Feedstock information

- a. **Total volume of Feedstock:** 1-200,000 tonnes
- b. **Volume of primary feedstock:** 1-200,000 tonnes
- c. **List of all the species in primary feedstock, including scientific name:**

|                     |                 |
|---------------------|-----------------|
| Fagus sylvatica     | European Beech  |
| Quercus petraea     | Sessile Oak     |
| Quercus robur       | Pedunculate Oak |
| Carpinus betulus    | Hornbeam        |
| Acer pseudoplatanus | Maple           |
| Fraxinus excelsior  | Ash             |
| Prunus avium        | Wild cherry     |
| Tilia cordata       | Lime            |
| Tilia platyphyllos  | Lime            |
| Betula pendula      | Birch           |
| Betula pubescens    | Birch           |
| Populus tremula     | Aspen           |

- d. **Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation?** No
- Explanation:**
- e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 100.00
- f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 0.00
- g. **Proportion of feedstock composed of or derived from saw logs by weight (%):** 10.00
- h. **Indicate how you determine the proportion of saw log:** Specification used by the sawmill closest to where the wood was grown.
- i. **Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 90.00
- j. **Select forest type(s) where the primary feedstock was sourced from:** Other Naturally Regenerated Forest
- k. **Select the main harvesting system(s) used for the sourced primary feedstock:** Thinning
- l. **Volume of primary feedstock from primary forest:** 0
- m. **Volume of processing residues feedstock:** 1-200,000 tonnes  
**Physical form of the feedstock:** Offcuts
- n. **Share of SBP-recognised system claim for processing residues:**

0.00 % PEFC

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**o. Volume of post-consumer feedstock:** 0

**Physical form of the feedstock:** Offcuts

**p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:**  
200000 tonnes

**q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 74000000.00 m3

**Explanation:** Inventaire forestière (IGN, 2023)

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### 3 Supply Base Risk Assessments and Risk Management Measures

*Guidance: Biomass Producers shall demonstrate that any specified risks of sourcing feedstock not in compliance with SBP Standard 1 have been adequately reduced to low risk, following Standard 2 requirements. Following section applies to Biomass Producer's implementing SBP Supply Base Evaluation (SBP RRA or company own risk assessment). EU RED Supply Base Evaluation details are reported in Annex 2.*

☒ **Not Applicable – Supply Base Evaluation not implemented**

#### 3.1 Summary of the Supply Base Evaluation

#### 3.2 Conflicts with applicable national and sub-national legislation

#### 3.3 Risk Management Measures

*Guidance: Please provide more details about specified risk indicators in each supply country and describe mitigation measures taken to address all specified risks associated with indicators.*

## 4 Stakeholder engagement

### 4.1 General description

**Biomass Producer's stakeholder engagement start date:**

**Biomass Producer's stakeholder engagement end date:**

**Total number of stakeholders contacted:**

**Give a general description of the process of Stakeholders Engagement, including stakeholders contacted, method of communication and a summary of the comments received:**

Stakeholders (Biomass suppliers, certification organisations, NGOs and local authorities and communities) are contacted on an annual basis. They are informed and invited to provide feedback through a dedicated communication channel. Information on the SBP certification is provided to stakeholders via links to the standard documents but also as accessible webinars hosted by the SBP. Feedback is recorded as well as the responses to them. The stakeholder engagement process is detailed in the SBP procedure document.

### 4.2 Response to stakeholder comments

## 5 Report updates and approval

**This document is:** New Supply Base Report (Assessments/reassessments)

**Summary of changes:** N/A

|                                |                 |
|--------------------------------|-----------------|
| <b>Name</b>                    | Thomas Harcourt |
| <b>Title</b>                   | Report author   |
| <b>Date of report approval</b> | 05 Sep 2025     |

## Annex 1: Detailed findings for Supply Base Evaluation indicators

## Annex 2: EU RED Supply Base Evaluation

Not Applicable (RED II SBE not included)

## Annex 2a: EU RED II Supply Base Evaluation

| Countries where RED II Supply Base Evaluation is used                                                                                                                                                                                                                                                                |                                                                                                                                                                             |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Country                                                                                                                                                                                                                                                                                                              | France                                                                                                                                                                      |
| Area                                                                                                                                                                                                                                                                                                                 | FR1, FRB, FRC, FRD, FRE, FRF, FRG, FRI, FRK, FRL                                                                                                                            |
| Sustainable harvesting criteria 29(6)                                                                                                                                                                                                                                                                                |                                                                                                                                                                             |
| (i) The legality of harvesting operations                                                                                                                                                                                                                                                                            |                                                                                                                                                                             |
| Type of Risk Assessment used                                                                                                                                                                                                                                                                                         | <input checked="" type="checkbox"/> Level A – proof at national or sub-national level<br><input type="checkbox"/> Level B – management system at forest sourcing area level |
| Level A risk assessment description                                                                                                                                                                                                                                                                                  | Level A for France by Agroenergie Conseil                                                                                                                                   |
| Level B management system at the level of the forest sourcing area                                                                                                                                                                                                                                                   | N/A                                                                                                                                                                         |
| (ii) Forest regeneration of harvested areas                                                                                                                                                                                                                                                                          |                                                                                                                                                                             |
| Type of Risk Assessment used                                                                                                                                                                                                                                                                                         | <input checked="" type="checkbox"/> Level A – proof at national or sub-national level<br><input type="checkbox"/> Level B – management system at forest sourcing area level |
| Level A risk assessment description                                                                                                                                                                                                                                                                                  | Level A for France by Agroenergie Conseil                                                                                                                                   |
| Level B management system at the level of the forest sourcing area                                                                                                                                                                                                                                                   | N/A                                                                                                                                                                         |
| (iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes |                                                                                                                                                                             |
| Type of Risk Assessment used                                                                                                                                                                                                                                                                                         | <input checked="" type="checkbox"/> Level A – proof at national or sub-national level<br><input type="checkbox"/> Level B – management system at forest sourcing area level |
| Level A risk assessment description                                                                                                                                                                                                                                                                                  | Level A for France by Agroenergie Conseil                                                                                                                                   |
| Level B management system at the level of the forest sourcing area                                                                                                                                                                                                                                                   | N/A                                                                                                                                                                         |
| (iv) That harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts                                                                                                                                                                         |                                                                                                                                                                             |
| Type of Risk Assessment used                                                                                                                                                                                                                                                                                         | <input checked="" type="checkbox"/> Level A – proof at national or sub-national level<br><input type="checkbox"/> Level B – management system at forest sourcing area level |
| Level A risk assessment description                                                                                                                                                                                                                                                                                  | Level A for France by Agroenergie Conseil                                                                                                                                   |
| Level B management system at the level of the forest sourcing area                                                                                                                                                                                                                                                   | N/A                                                                                                                                                                         |

| (v) That harvesting maintains or improves the long-term production capacity of the forest. |                                                                                                                                                                             |
|--------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Type of Risk Assessment used                                                               | <input checked="" type="checkbox"/> Level A – proof at national or sub-national level<br><input type="checkbox"/> Level B – management system at forest sourcing area level |
| Level A risk assessment description                                                        | Level A for France by Agroenergie Conseil                                                                                                                                   |
| Level B management system at the level of the forest sourcing area                         | N/A                                                                                                                                                                         |
| LULUCF criteria 29(7)                                                                      |                                                                                                                                                                             |
| Type of Risk Assessment used                                                               | <input checked="" type="checkbox"/> Level A – proof at national or sub-national level<br><input type="checkbox"/> Level B – management system at forest sourcing area level |
| Level A risk assessment description                                                        | Level A for France by Agroenergie Conseil                                                                                                                                   |
| Level B management system at the level of the forest sourcing area                         | N/A                                                                                                                                                                         |

## Annex 3: SBP Processing residues and/or Post-consumer feedstock requirements

☐ Not Applicable (Processing Residues and/or post-consumer feedstock not used)

### Verification and monitoring of suppliers

New processing residue feed stock suppliers are audited according to the internal procedure for doing so. The objective of the post-processing residue supplier audit is to ensure that the biomass supplied complies with the requirements of the SBP programmes. For sawmills and other processing residue producers, the objective is to ensure that the wood supplied to the sawmill is processed into timber and that the offcuts are sold as processing residues. More specifically, no high-quality wood is processed directly into processing residues. If during a supplier audit a risk of supply of non-compliant wood is identified then the audit should be repeated at a later date. If an audit is not possible due to commercial issues a risk assessment will be carried out on the likely supply area of the sawmill or trader in question.

### Feedstock inspection and classification upon receipt

Deliveries are classified upon reception and inspected once unloading is complete. Processing residues are classified visually and stored in a dedicated storage area, however once in the process processing residues cannot be physically separated in the final product.

### Supplier audit for processing residues and post-consumer feedstock

Over the last twelve months twenty three audits have been completed, there are five outstanding audits which should be completed

First visits should be performed within three months of first supply only unless personnel availability prevents this. This allows confirmation of residue classification, record keeping and traceability are being applied consistently once the supplier has started real deliveries. This is justified as non-conformities would only be detectable once supply chains are operational, a visit before first supply would not indicate future performance and would prevent an accurate analysis of supplier performance. Therefore visit after first supply gives an opportunity to catch and correct mistakes before they become systemic in the supply chain.

### Review documentation

- Review permits, licenses, and regulatory compliance documents.
- Prior to the audit, select an invoice from the previous three months with the objective of tracing the source of the timber supplied to CARBONEX.

### Inspection of facilities

- Inspect records relating to biomass production, quality control and sustainable development practices.
- Assess stocks and site organisation to evaluate consistency with the figures provided.
- Physically inspect biomass storage, processing and transport facilities.
- Check the condition and maintenance of equipment.

### Interviews

- Interview key personnel, including management, quality control staff and environmental compliance officers.
- Inquire about safety procedures in the event of an accident
- Identify inconsistencies and seek explanations from management.

### Record observations

- Record observations, findings and any deviations from the audit criteria.

## Annex 4: EU RED detailed findings for Trees Outside Forest (TOF) feedstock

*NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no EU RED sustainability requirements apply, only the GHG savings criteria apply (SBP EU RED Bridging ID v2.0 Section 1.1). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).*

Not Applicable (RED II TOF not included)

## Annex 4a: RED II detailed findings for Trees Outside Forest (TOF) feedstock

*NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no REDII sustainability requirements apply, only the GHG savings criteria apply (SBP REDII Bridging ID Section 4.2). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).*