Compliance with the SBP Framework: Public Summary Report

Preferred by Nature OÜ
Evaluation of Drax Power Limited

Fourth 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

Version 2.0	**Published 10 August 2023**
Version 2.1	Published 21 May 2025

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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:	Lennart Holm
Audit team members:	-
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 2021
Date of certificate expiry:	09 Oct 2026

Audit closing meeting date:	27 Jun 2025
Audit cycle:	Fourth 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:	02 Sep 2025
Other comments:	N/A

2.2 Open non-conformities and observations

2.2 Closed non-conformities

2.3 Actions taken by Organisation Prior to Report Finalisation

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2.4 Notes for the next Audit

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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 v2.0
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) 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	Pellets
Feedstock origin (countries):	
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	Yes
Changes in the scope	Transfer to V2 Added trader as secondary activity

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 an energy producer from the UK with both the office and the power plant located in the same place at Selby. Drax Power is procuring wood pellets from USA, Canada, Portugal, Baltic countries, Brazil and other countries. The Organization holds FSC and PEFC certificates with transfer system implemented. The point of purchase varies and can be either FOB or CIF at different ports in the world. The Organization's certificate scope covers REDIII sustainability criteria.

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.

The Organization has implemented the FSC and PEFC transfer system for biomass (wood pellets only) in the scope of the certificate. The process covers trade of biomass without physical posession. The material from different suppliers can be mixed on one ship once it´s loaded. However, in such cases individual batches with different claims would remain the same on input and output by using mass balance approache to distinguish between different materials (in order to follow the GHG, profiling and batch specific characteristics of the material). Each purchased material is recorded in the internal system. These records include the certification status of the material and the sales documents always contain the same type and quantity of material as purchased. The SBP and REDII claims are communicated through DTS. Furthermore, the Organization is storing material in different ports and may trade it with physical possession. Should it be the case, physical segregation procedures will be implemented. In case the material would be uncertified it would not be received, and non-conforming product procedure would be followed.

4 Specific objective of the audit

The specific objective of this evaluation was to confirm that the Organization'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 Biomass Trader’s management procedures
- 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 and sales
- REDIII transaction

5 Evaluation process

5.1 Timing and duration of evaluation activities

Audit Level of Effort (LoE)		
Activity	**Auditors**	**Auditor hours**
1. Preparation	Lennart Holm	4.0
2. On-site (excl. travel time)	Lennart Holm	16.0
3. Report writing	Lennart Holm	6.0

5.2 Auditor team qualification

Auditor qualification		
Auditor name	**Role**	**Qualification**
Lennart Holm	Audit team leader	Lennart is a Senior 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.

5.3 Description of evaluation activities

The audit was conducted on-site, on June 26, 2025 with a visit to two storage sites on June 27, 2025.
All documentation connected to the CoC systems of the Organization, including requirements of SBP V2 Std 4, as well as procedures, volume summaries, transaction records and sample documents had been provided by the Organization prior to the audit.
Audit of core activities were conducted on June 26, 2025, alongside SBP and FSC/PEFC CoC audits, and was focused on management system evaluation: division of the responsibilities, record keeping, input material classification (reception and registration), analysis of the existing certification management systems and CoC critical control points, FSC core labour requirements, business integrity, transfer to V2 of the SBP standards 4 and 5, EU RED and clarification of DRAX trading activities.
During the opening meeting, the audit team 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.
After that during interviews and documentation review all applicable requirements of the FSC, PEFC CoC standards as ell as SBP V2 Std 4 were evaluated. During the process, the overall responsible person for the SBP system and other staff were interviewed.
On June 27, 2025 two storage sites were visited to review product handling, storage procedures, FSC Core Labour Requirements and Business Integrity.

At the end of the audit, findings were summarized, and preliminary audit conclusions based on the use of 3 angle evaluation method were provided to the Organization's management and FSC responsible person. 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
DRAX is an end-user and trader without physical possession.

5.5 Describe audit sampling methodology used

When preparing to the audit and during on-site work a sampling has been implemented, based on the following criteria: a sample of the four storage sites the company has identified using the square root of four which resulted in the visit of two storage sites, a full review of procedures; full review of training records; sample review of information related to suppliers. For evaluation of DTS, input and output trade and transport documentation, and the correctness of claims a sampling of different kinds of documents for the reporting period is implemented (e.g. waybills, invoices, bills of landing, etc.). Sampling was based on a risk approach, taking into account the following: - Changes in a management system; - Standards requirements update; - Staff changes; - Market development; - Periods with most and less activities; etc. Interviews with staff, are mandatorily conducted during every audit. The focus is a key staff responsible for the management of processes at a particular department or site.

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 internal system is well organized, high quality supplier evaluation prior its acceptance, double evaluation of each delivery in terms of sustainability claims.
Weaknesses: No weaknesses identified

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 organization has implemented the CoC system per SBP Standard No. 4. The BP has developed and implemented Chain of custody system according to SBP Standard 4 requirements and has in addition implemented the FSC and PEFC transfer system for biomass (wood pellets only) in the scope of the certificate. The process covers trade of biomass without physical possession. The material from different suppliers can be mixed on one ship once it´s loaded. However, in such cases individual batches with different claims would remain the same on input and output by using mass balance approach to distinguish between different materials (in order to follow the GHG, profiling and batch specific characteristics of the material). But since the organization only purchase and sell SBP compliant biomass, the risk is deemed low. Each purchased material is recorded in the internal system. These records include the certification status of the material and the sales documents always contain the same type and quantity of material as purchased. The SBP and REDII and EU RED claims are communicated through DTS. Furthermore, the Organization is storing material in different ports and may trade it with physical possession. Should it be the case, physical segregation procedures will be implemented. In case the material would be uncertified it would not be received, and non-conforming product procedure would be followed.

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

5.13 Summary of audit findings for competency of involved personnel

The persons with overall responsibility and authority for compliance with all applicable certification requirements are the Head of Industry Frameworks and Supply Chain Compliance, and Compliance Managers. Responsibilities are also shared among other staff teams: the Supply Chain Compliance, the Business Ethics, Logistics and Operational Support. During the interview all the personnel provided good knowledge and performance of the requirements in relation to certification.

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