Final Audit Report

Audited Body	
Puro.earth Project Proponent	Carbofex Oy
Name of Contact for Puro.earth Project Proponent	Janne Kantero
Production Facility Operator	Carbofex Oy
Name of Contact for Production Facility Operator	Olli Talaslahti
Production Facility name	Carbofex Nokia 1
Production Facility ID	507468
Production Facility Location	Kaarnakatu 1 – 37150 Nokia – Finland

Audit Description	
Type of Audit	Production Output Audit
Number of CORCs under Audit	864.21
Tonnes of dry biochar in stock (start)	40.02
Tonnes of dry biochar produced under Audit	276.35
Tonnes of dry biochar used under Audit	276.35
Tonnes of dry biochar in stock (end)	0
CORC conversion factor under Audit	3.12722996 tCO_2e per tonne dry biochar
Reporting Period Covered by Audit	1 January 2025 to 30 September 2025
Objective of Audit Engagement	Provide assurance opinion against requirements of Puro.earth Rules v3.1
Date of Auditor Engagement	26 November 2025
Date of Audit Report Submission	21 January 2026

Audit Outcomes	
Number of eligible CORCs	857.19
Tonnes of dry biochar in stock (start)	0
Tonnes of dry biochar produced under Audit	274.42
Tonnes of eligible dry biochar used	274.42
Tonnes of dry biochar in stock (end)	0
CORC conversion factor	3.12364259 tCO_2e per tonne dry biochar
Calculation Method	Biochar Methodology Edition 2022

Auditing Body	
Auditor	EnergyLink Services Pty Ltd
Lead Auditor	Rodrigo Pardo Patron
Additional Audit Personnel	Tom Croxford
Peer Reviewer	Katherine Simmons

This document details the nature and scope of the services provided by a member of EnergyLink Services in respect to the biochar production output and CO_2 Removal Certificates (CORCs) claims from an approved Production Facility under the requirements of Biochar Methodology v3.0 (Edition 2022) and the Puro Standard General Rules v3.1.

This document is issued to Puro.earth detailing audit procedures conducted and the auditor's opinion in relation to the eligibility of the Production Facility. It should not be used for any other purpose.

Because of the inherent limitations in any internal control structure, it is possible that fraud, error, or non-compliance with laws and rules may occur and not be detected. Further, the audit was not designed to detect all weakness or errors in internal controls so far as they relate to the requirements set out above as the audit has not been performed continuously throughout the period and the procedures performed on the relevant internal controls were on a test basis. Any projection of the evaluation of control procedures to future periods is subject to the risk that the procedures may become inadequate because of changes in conditions, or that the degree of compliance with them may deteriorate.

The audit opinion expressed in this report has been formed on the above basis.

Copies of relevant documentation are available on the Puro.earth website: puro.earth

COMMERCIAL AND CONFIDENTIAL

Version Control Record

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Document File Name	Date Issued	Version	Lead Auditor	Peer Reviewer
20260121 Carbofex Oy Biochar Output Final Audit Report vF.0	21 January 2026	vF.0	Rodrigo Pardo Patron	Katherine Simmons

Contents

Abbreviation	Description
'H'	Hydrogen
'O'	Oxygen
CO_2	Carbon Dioxide
CORC	CO_2 Removal Certificate
C_{org}	Organic Carbon
GHG	Greenhouse Gas
LCA	Life Cycle Assessment
OC	Overcalculation
UC	Undercalculation
QA	Quality Assurance
The Puro Rules	the Puro Standard General Rules v3.1
The Biochar Methodology	Edition 2022

PART A: Auditor's Report

To: Puro.earth

Dear Sir / Madam,

EnergyLink Services Pty Ltd (EnergyLink) were engaged to perform a reasonable assurance audit of Carbofex Oy's CO_2 removal calculation for the reporting period covered by the audit, from 1 January 2025 to 30 September 2025, against the eligibility requirements of 'the Puro Standard General Rules v3.1' (hereafter referred to as "the Puro Rules").

Details of Audited Body

Puro.earth Project Proponent	Carbofex Oy
Production Facility Operator	Carbofex Oy
Production Facility name	Carbofex Nokia 1
Production Facility ID	507468
Production Facility location	Kaarnakatu 1 – 37150 Nokia – Finland

Responsibility of the Audited Body' Management

The management of the audited body is responsible for the application of the requirements of 'Biochar Methodology Edition 2022 (hereafter referred to as "the Biochar Methodology") in quantifying CO_2 Removal Certificates (CORCs) from the production of biochar, which is reflected in the proof provided to EnergyLink.

The management of the audited body is responsible for preparation and presentation of the evidence in accordance with Section 5 the Biochar Methodology. This responsibility includes the design, implementation, and maintenance of internal controls relevant to the preparation and presentation of proofs that are free from material misstatement, whether due to fraud or error.

Our independence and quality control

EnergyLink have complied with the relevant ethical requirements relating to assurance engagements, which include independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence, due care, confidentiality, and professional behaviour. These include all the requirements defined in the *Fortum – Supplier Code of Conduct*[1]. Additionally, EnergyLink and the verification team declare no conflict of interest with the audited body for this engagement.

Furthermore, EnergyLink maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements, in accordance with *ISQC 1 Quality Control for Firms that Perform Audits and Reviews of Financial Reports and Other Financial Information.*

[1] Fortum (2020), Fortum – Supplier Code of Conduct, available at: www.fortum.com/about-us/contact-us/suppliers/code-of-conduct

Our responsibility

EnergyLink's responsibility is to express an opinion on the audited body's quantification of CORCs and compliance with the *Puro Rules* based on the procedures we have performed and the evidence we have obtained.

We have conducted a reasonable assurance engagement in accordance with the *Puro Rules* and relevant international standards, as listed below:

- International Standards on Assurance Engagements ISAE 3000 Assurance Engagements other than Audits or Reviews of Historical Financial Information.
- ISQC 1 Quality Control for Firms that Perform Audits and Reviews of Financial Reports and Other Financial Information, and Other Assurance Engagement.

A reasonable assurance engagement in accordance with relevant international standards involves performing procedures to obtain evidence about the Production Facility process controls and quantification of CORCs in accordance with the Puro Rules. The nature, timing and extent of procedures selected depend on the assurance practitioner's judgement, including the assessment of the risks of material misstatement, whether due to fraud or error. In making those risk assessments, we considered internal controls relevant to the audited body's preparation of proofs. We believe that the assurance evidence we have obtained is sufficient and appropriate to provide a basis for our assurance conclusion.

Summary of procedures undertaken

The procedures we conducted in our reasonable assurance engagement included:

- reviewing evidence provided by the audited body;
- assessing the audited body against eligibility criteria;
- conducting interviews and a (virtual) site visit to validate the evidence provided;
- analysing procedures that the audited body used to gather data;
- testing of calculations that the audited body performed; and
- identifying and testing assumptions supporting the calculations.

Use of our reasonable assurance engagement report

This audit report has been prepared for use by the audited body and Puro.earth for the sole purpose of reporting on the audited body's quantification of CORCs and compliance with the *Puro Rules*. Accordingly, EnergyLink expressly disclaim and do not accept any responsibility or liability to any party other than Puro.earth and the audited body for any consequences of reliance on this report for any purpose.

Inherent limitations

There are inherent limitations in performing assurance audits - for example, assurance engagements are based on selective testing of the information being examined - and because of this, it is possible that fraud, error, or non-compliance may occur and not be detected. An assurance engagement is not designed to detect all misstatements, as an assurance engagement is not performed continuously throughout the period that is the subject of the engagement, and the procedures performed are based on a test basis. The conclusion expressed in this report has been formed on the above basis.

Additionally, non-financial data may be subject to more inherent limitations than financial data, given both its nature and the methods used for determining, calculating, and sampling or estimating such data.

Corrective Action Requests / Recommendations

During the audit process, the auditor issued one corrective action request, which was addressed during the course of the audit. Further, the auditor issued two recommendations that need to be implemented by the next audit and two suggestions for improvement which are optional to be implemented.

Corrective Action Request 1: Traceability between Evidence and Calculation Inputs

The auditor found limited traceability between the CORC calculation inputs and the supporting evidence. The values in the CORC summary and the LCA were hard-coded and did not clearly reference invoices or summary tables. Furthermore, evidence of the production volumes and delivery logs was limited.

During the audit process, Carbofex Oy provided evidence, including invoices and summary tables, reviewed the calculations, and updated the CORC inputs and the LCA. These updates included:

- The consideration of the actual woody biomass quantities received on site, which affected the transport and upstream emissions;
- Estimation of the emissions associated with the transport of wet biomass using the average moisture levels supplied by the biomass supplier, rather than a historic moisture content;
- Update of the electricity consumption with invoiced data, affecting the production emissions;
- Adjustment of the emissions from packaging materials and biochar end-use, following the application of average recycling rates[2], previously not considered; and
- Review of the diesel consumed, based on diesel purchase invoices, which impacted the production emissions.

Finally, the biochar production and use were revised based on invoiced sales data, reducing the total volume of biochar credited and the number of eligible CORCs for the reporting period.

The above updates were deemed accurate and conservative by the auditor and resulted in a net over-calculation of 7.02 CORCs.

Recommendation 1: Record Keeping and Quality Assurance

Finding

The auditor found the following key issues:

- The LCA calculations were unclear, with hard-coded values and inadequate record-keeping as periodic operational records, including monthly energy consumption, biochar production, and delivery logs, were initially excluded from the evidence pack; and
- Carbofex Oy referenced laboratory tests conducted long time before the production of certain batches of biochar without a clear linkage between the evidence provided and the biochar produced (e.g., a September 2025 batch was linked to a September 2024 lab test).

All issues were corrected during the course of the audit and formed part of the review made under Corrective Action Request 1.

[2] Customer-specific recycling data was available for three of the five largest customers, covering 41% of biochar volumes. For the remaining 59%, a conservative recycling rate of 33.5% was applied, based on publicly available Nordic statistics (33.5% for Sweden and 39.4% for Finland). Source: Nordic Council of Ministers. *Appendix D: Nordic Statistics.* In Nordic circular economy statistics 2024, TemaNord 2024:515. Available at: https://pub.norden.org/temanord2024-515/appendixd-nordic-statistics.html

Recommendation

To mitigate the risks of improper CORC creation and ensure data integrity, the auditor recommends Carbofex Oy augment its record keeping and quality assurance procedures to:

- Maintain comprehensive operational data, including monthly energy consumption, biochar production volumes, and delivery logs, aligned with audit evidence;
- Replace hard-coded values with evidence-based inputs directly linked to supporting documentation;
- Document procedures covering data collection and LCA preparation; and
- Define an appropriate testing frequency and utilise the findings to demonstrate the relevance of laboratory tests to all biochar batches.

Recommendation 2: Biochar Dry Mass

Observation

Carbofex Oy estimated the dry biochar weight using the dry bulk density by volume method based on 2m^3 bags. However, the lack of biochar analysis from within the reporting period limits the accuracy of this approach.

Recommendation

The auditor recommends Carbofex Oy implement procedures to ensure an accurate measurement of the mass (i.e. tonnes) of dry biochar produced is used for its CORCs claim. This can be achieved by more frequent lab testing to maintain an accurate biochar bulk density, or by weighting the wet biochar and measuring each batch's moisture content.

Suggestion for Improvement 1: LCA

Observation

The auditor found missing evidence and discrepancies between evidence and calculation inputs that led to the findings described in Corrective Action Request 1.

After Carbofex Oy made the amendments to the CORC summary, the auditor noted that it had zero emissions recorded. Upon clarification, the auditor was informed that Carbofex Oy and Puro.earth had an agreement regarding a licensing issue linked to the LCA model.

Carbofex Oy originally worked with an LCA consultant to develop the model using emission factors from the ecoinvent database. However, Carbofex Oy did not acquire rights to the licensed ecoinvent data. After their engagement ended, the consultant agreed to provide the LCA model only to Puro.earth, as Puro.earth held the necessary ecoinvent licence. Under this arrangement, Carbofex Oy sent the updated activity data to Puro.earth, who incorporated it into the confidential LCA model and appended the updated version to the audit package.

Suggestion for Improvement

The auditor suggests Carbofex Oy to either engage an LCA consultant, obtain an ecoinvent license or seek an alternative that enables them to conduct their own LCA.

Suggestion for Improvement 2: Electricity Consumption

Observation

The auditor found that electricity consumption was metered centrally, but there was a lack of assumptions that supported the estimations used to allocate these emissions to stages of the biochar production process. The auditor noted that the total electricity consumption was accurately considered and the total emissions were correctly calculated.

Suggestion for Improvement

The auditor suggests that Carbofex Oy enhance its electricity submetering and document assumptions made in relation to the allocation of electricity consumption throughout the biochar process to enhance the accuracy of the emissions related to onsite electricity consumption.

Overall Conclusion

Qualified Conclusion (Production Output Audit)

Production Output Audit

The lead auditor is able to express a qualified reasonable assurance opinion that, noting the effects of Corrective Action Request 1, as well as the matters discussed in Basis for Qualified Conclusion, the quantification of 857.19 CO_2 Removal Certificates (CORCs) by Carbofex Oy for the period 1 January 2025 to 30 September 2025, in all material aspects, is correct. The auditor identified that the eligible CORC quantity has been calculated in accordance with the Puro Standard General Rules v3.1, and all eligibility requirements have been met. A summary of the CORCs under audit is provided in Table 1.

Table 1: Audited CORCs summary

Biochar	CORCs Under Audit	Abs. Error (CORCs)	Net Error (CORCs)	Eligible CORCs	Abs. Error Rate (%)	Net Error Rate (%)
Total	864.21	7.02	7.02 OC	857.19	0.812%	-0.812%

*OC = Overcalculation / UC = Undercalculation

Basis for Qualified Conclusion

The auditor identified inconsistencies in the calculation of CORCs completed by the audited body that whilst immaterial in nature, they present a risk of miscalculation going forward.

Amongst the inconsistencies identified are:

- Several LCA inputs were not supported by traceable evidence;
- Errors in the CORC calculations that were corrected during the audit; and
- The Biochar produced and sent was recorded in volume and the subsequent calculation to mass relied on limited laboratory results and assumptions.

Sincerely,

Rodrigo PARDO PATRON | Director of Engineering
EnergyLink Services Pty Ltd
Lead Auditor
21 January 2026

Part B: Detailed Findings

Audit Findings and Conclusions

Table 2 to Table 5 summarises the findings from the Production Output Audit. As part of the audit procedures, the auditor performed interviews with site representatives and a virtual site visit to the Production Facility. Where possible, the findings from these procedures were used to validate that the eligibility criteria under the methodology had been met, that the proofs and evidence provided by the audited body were accurate, and that the metering used to quantify the Output was appropriate and correctly calibrated (for details refer to Appendix C).

Eligibility Assessment

Table 2: Eligibility Assessment

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Confirm that the biochar is used in applications other than energy.	Y	The auditor confirmed that Carbofex Oy made claims on invoices that the biochar sold was used for soil amendment, water filtering and compost additive.	N/A.
Confirm that the biochar is produced from sustainable forest or waste biomass raw materials.	Y	The auditor confirmed that the biochar was produced using sustainably sourced biomass, certified by the certificates *Kestävän Metsätalouden Yhdistys ry* (Helsinki) and *Metsäsertifikaatti_Kouhintila*.	N/A.
Confirm that the producer demonstrates net-negativity with results from a LCA that shows: – [A1 Biomass and A2 Transport of biomass] carbon footprint of the biomass production and supply. – [A3 Production] emissions from the biochar production process. – [A4 Transport of biochar to site] carbon footprint of the biochar end use. – [B1 Application and use] cradle to grave.	Finding	Initially, the auditor noted limited correlation between the evidence provided and the CO_2 removal calculation inputs. After the RFI stage and the virtual site visit, Carbofex Oy supplied required invoices and amended the necessary documents to improve the traceability between the LCA, CORC summary and the evidence provided. Considering the above, the auditor confirmed that Carbofex Oy demonstrated net-negativity, covering all aspects of the grade-to-crave life cycle.	Corrective Action Request 1

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Confirm that the biochar production process meets requirements 1.1.4 to 1.1.6 of the Biochar Methodology, namely that: – It has considered the emissions related to the use of fossil fuels (coal, oil, natural gas). – there is no co-firing of fossil fuels and biomass in the same reaction chamber. – the pyrolysis gases are recovered or combusted. – the molar H/C_{org} ratio is less than 0.7.	Y	The auditor confirmed that although the pyrolysis reactor is an auto-thermal process, in which the thermal energy required to run the process is created from the feedstock being processed, the system relied on diesel to start the process (each week) and heat the reactor to the required temperature and pressure. The auditor verified that these emissions were considered. The auditor also confirmed that an electric chipper was used onsite to process the biomass.	N/A.
		During the virtual site visit, the auditor confirmed that pyrolysis gases were recovered and combusted in the reactor; excess gases were sent to the boiler or flared. Bio oil was recovered at various reactor points, and LPG powered the flare pilot flames.	
		The molar H/Corg ratio is 0.144, which is less than 0.7.	
Confirm that measures are taken for safe handling and transport of biochar to prevent fire and dust hazards.	Y	The auditor confirmed via discussions with Carbofex Oy personnel that appropriate safety measures were taken to ensure the safe handling and transport of the biochar. The biochar produced is sprayed with water in an encapsulated conveyor belt, and jacket cooling water is also utilised as part of the process to manage temperature and ensure safe conditions. The use of a telehandler allowed for safe handling of large volumes of biochar and biomass.	N/A.

Confirmation of Production Facility Eligibility

Table 3: Production Facility assessment

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Confirm the Production Facility Eligibility under the general rules of Puro Standard.	Y	The auditor confirmed that the audited body had already gone through a Production Facility Audit in 2023 and achieved a positive outcome.	N/A.
Confirm that the Production Facility demonstrate Environmental and Social Safeguards.	Y	The auditor confirmed that the CO_2 Removal Supplier showed sufficient evidence to demonstrate that the Production Facility does no significant harm to the surrounding natural environmental and local communities. Nothing has changed since the facility audit to indicate any change to these findings.	N/A.

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Confirm that the quantity of biochar produced and sold is documented via appropriate processes.	Finding	The auditor found limited traceability between the CORC calculation inputs and the supporting evidence. The values in the CORC summary and the LCA were hard-coded and did not clearly reference invoices or summary tables. Furthermore, evidence of the production volumes and delivery logs was limited. During the audit process, Carbofex Oy provided evidence, including invoices and summary tables, reviewed the calculations, and updated the CORC inputs and the LCA. These updates included: - The consideration of the actual woody biomass quantities received on site, which affected the transport and upstream emissions; - Estimation of the emissions associated with the transport of wet biomass using the average moisture levels supplied by the biomass supplier, rather than a historic moisture content; - Update of the electricity consumption with invoiced data, affecting the production emissions; - Adjustment of the emissions from packaging materials and biochar end-use, following the application of average recycling rates [3], previously not considered; and - Review of the diesel consumed, based on diesel purchase invoices, which impacted the production emissions. Finally, the biochar production and use were revised based on invoiced sales data, reducing the total volume of biochar credited and the number of eligible CORCs for the reporting period. The above updates were deemed accurate and conservative by the auditor and resulted in a net over-calculation of 7.02 CORCs.	Corrective Action Request 1

[3] Customer-specific recycling data was available for three of the five largest customers, covering 41% of biochar volumes. For the remaining 59%, a conservative recycling rate of 33.5% was applied, based on publicly available Nordic statistics (33.5% for Sweden and 39.4% for Finland). Source: Nordic Council of Ministers. *Appendix D: Nordic Statistics*. In Nordic circular economy statistics 2024, TemaNord 2024:515. Available at: https://pub.norden.org/temanord2024-515/appendixd-nordic-statistics.html

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Confirm that metering infrastructure is in place to determine: - the production output. - the energy use of the Production Facility.	Finding	Carbofex Oy estimated the dry biochar weight using the dry bulk density by volume method based on 2m^3 bags, citing it as a standardised approach. Further, Biochar testing lacked representativeness. Carbofex Oy referenced batches to laboratory tests conducted long before production, without clear evidence linking the tests to the actual biochar produced. The auditor noted that no laboratory tests were conducted during the reporting period. However, tests performed before and after this period were consistent and comparable, supporting the assumption that the values used for biochar characteristics and CORC calculations are adequate, as the biochar composition has remained largely unchanged. Considering the above, the auditor confirmed that appropriate metering infrastructure was in place to quantify the produced biochar. Recommendation 1 and Recommendation 2 were issued to improve the determination of the production output going forward.	Recommendation 1 Recommendation 2
	Finding	The auditor observed that electricity consumption was measured centrally; however, there were no documented assumptions to justify the estimations used for allocating emissions across the stages of the biochar production process. Despite this, the auditor confirmed that the total electricity consumption was accurately accounted for and that overall emissions were correctly calculated. The auditor suggested that Carbofex Oy implement enhanced electricity submetering and clearly document the assumptions applied when allocating electricity consumption throughout the biochar production process. This will improve the accuracy of emissions reporting related to onsite electricity use.	Suggestion for Improvement 2

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Confirm the calculations used to quantify emissions from the process. These must account for: – Cultivating and harvesting of raw materials (forest vs other biomass). – The energy source used in the production process. – Transporting of raw materials to the Production Facility (based on distance transported and fuel used).	Y	The auditor confirmed the emissions from the cultivation and harvesting of raw materials, the emissions from the production and transportation of the raw materials to the production facility were adequately calculated.	N/A
	Observation	The auditor determined that electricity consumption was measured centrally, and emissions were allocated to the biochar production process using estimations that lacked sufficient justification. Consumption was distributed based on the following assumptions: 30% for woodchipper use, 40% for dryer use, and 30% for the production process. Considering the above, the auditor verified that emissions from all energy sources, including fuel oil, diesel for pyrolysis startup and telehandler use, were included.	Suggestion for Improvement 2
	Finding	After reconciliation of the Facility records with the LCA, emissions from woody biomass and its transport lowered slightly. Utility bills also highlighted a slight drop in electricity consumption. The auditor confirms raw material transportation emissions were accounted for. This adjustment resulted in a change in the number of CORCs	Corrective Action Request 1

Quantification of CO_2 Removal

Table 4: Quantification of CO_2 Removal - Calculation Methodology

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Confirm that the quantification of CO_2 removal is calculated using the Calculation formula of CO_2 removal.	Y	The auditor examined the CORC calculator provided by the audited body and confirmed that the formulae applied in the quantification of CO_2 removal for biochar were in accordance with the Puro Rules.	N/A.
Confirm that the inputs to the Calculation formula of CO_2 removal are appropriate and consistent with the evidence provided.	Finding	As noted in Corrective Action Request 1, the auditor observed limited correlation between the evidence provided and the CO_2 removal calculation inputs. The auditor has issued Recommendation 1 to ensure checks are performed to the calculations prior to the creation of CORCs. The auditor noted that Carbofex Oy sell some CORCs along with the biochar that they sell to the same purchaser. This requires better record keeping procedures to ensure no double-counting occurs. Since Carbofex Oy only collected data from three out of its five largest customers, they averaged this information across all biochar tonnes, leading to a rise in packaging material and end-use emissions. An increase in diesel usage was recorded according to invoices. Biochar production and usage figures were reduced, reflecting the amount invoiced that was eligible for CORCs. These adjustments had an impact on the number of CORCs	Corrective Action Request 1 Recommendation 1

Verification of Proofs

Table 5: Verification of proofs and documentation

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Confirm that the standing data for the Production Facility meets the requirements of the Biochar Methodology and is consistent with other evidence.	Y	The auditor reviewed and validated the standing data provided by the audited body and confirmed this was consistent with desktop testing and the virtual site visit.	N/A.
Confirm that the necessary proof and evidence documents are maintained by the Production Facility as per Section 5 of the Biochar Methodology[4].	Y	The auditor confirmed all necessary evidence has been provided as per Section 5 of the Biochar Guidelines.	N/A.
Confirm the biochar properties are based on laboratory analyses performed in laboratories accredited by national authorities and comply with international testing standards (e.g. ASTM, ISO, AS, D).	Finding	The auditor confirmed the laboratory tests presented by Carbofex Oy were obtained from Eurofins Umwelt, certified under DIN EN ISO/IEC 17025:2018. At the time of the audit, Carbofex Oy had a half yearly laboratory testing regime. The auditor found that Carbofex Oy conducted an annual EBC analysis for audit purposes, and supplied this analysis for 2025 during the audit. The auditor has issued Recommendation 1 to determine an appropriate testing frequency to ensure a representative analysis of the biochar characteristics is made.	Recommendation 1

[4] Information in Section 5 of the Biochar Methodology includes:
- Proof of sustainability of raw material for forest and/or waste biomass.
- LCA data for biomass and biochar production.
- Justification on the soil temperature used for the calculation of the biochar sequestration.
- Proof of product quality, production volume, sales and end use of biochar.
- Proof of no double counting/C positive marketing.

Peer Reviewer Conclusion

Name of the peer reviewer	Katherine Simmons
Peer reviewer's credentials	• Bachelor of Engineering (Honours) in Polymer Engineering (minoring in Chemical Engineering). • Category 1 Registered Greenhouse and Energy Auditor with the Clean Energy Regulator (Australia). • Climate Active Registered Consultant. • Integrated Management Systems Lead Auditor ISO 19011, ISO 9001:2015, ISO 14001:2015, ISO 45001:2018.
Peer reviewer contact details	Email: katherine.simmons@kreaconsulting.com.au Phone: +61 431 612 950
Outcome of the evaluation undertaken by the peer reviewer	I have reviewed the engagement letter, audit report and supporting work papers / source data and am satisfied that the audit has been performed in accordance with the eligibility requirements of General Rules of Puro Standard General Rules Version 3.1.

Appendix A: Previous Audit Recommendations

The auditor observed that the previous audit report by DNV contained no formal recommendations and did not indicate any potential improvements would need to be assessed during the subsequent audit.

Appendix B: Table of Site Visit Findings

Table 6: Site visit summary table

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Check that the raw material is of eligible type and sustainably sourced.	Y	The auditor verified that the biochar was made from sustainably sourced biomass, as certified by 'Kestävän Metsätalouden Yhdistys ry Helsinki' and 'Metsäsertifikaatti_Kouhintila'.	N/A.
Check that the LCA provided is consistent with observations on site.	Finding	Initially, The LCA had errors, as outlined in Corrective Action Request 1, however, the auditor confirmed that the revised LCA provided was an accurate representation of the Production Facility and used appropriate assumptions where necessary.	Corrective Action Request 1
Confirm that the LCA considered the emissions related to the use of fossil fuels (coal, oil, natural gas) for ignition, pre-heating, or heating of the pyrolysis reactor. Additionally, there is no co-firing of fossil fuels and biomass in the same reaction chamber.	Y	The auditor confirmed that although the pyrolysis reactor is an auto-thermal process, in which the thermal energy required to run the process is created from the feedstock being processed, the system relied on diesel to start the process (each week) and heat the reactor to the required temperature and pressure. The auditor verified that these emissions were considered. The auditor also confirmed that an electric chipper was used onsite to process the biomass. During the virtual site visit, the auditor confirmed that pyrolysis gases were recovered and combusted in the reactor; excess gases were sent to the boiler or flared. Bio oil was recovered at various reactor points, and LPG powered the flare pilot flames.	N/A.
Evidence of safe handling and transport is provided and adequate for the production facility.	Y	The auditor confirmed via discussions with Carbofex Oy personnel that appropriate safety measures were taken to ensure the safe handling and transport of the biochar. The biochar produced is sprayed with water in an encapsulated conveyor belt, and jacket cooling water is also utilised as part of the process to manage temperature and ensure safe conditions. The use of a telehandler allowed for safe handling of large volumes of biochar and biomass.	N/A

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Check that the Production Facility's documentation system is accurate and reliable for recording the quantity of biochar produced and sold.	Y	The auditor confirmed during the virtual site visit that an appropriate system was in place to quantify the biochar produced and sold during the reporting period.	N/A.
Check that appropriate metering infrastructure is in place and calibrated correctly to quantify the Production Facility output and the energy use of the Production Facility.	Finding	The auditor noted that Carbofex Oy estimated the dry biochar weight using the dry bulk density by volume method based on 2 m^3 bags.	Recommendation 2
Check that appropriate processes are in place to quantify the inputs to the Calculation formula of CO_2 removal for the purpose of Preparing the Output Report and calculating CORCs.	Finding	During the site visit, the auditor noted that the inputs to the calculation formula of CO_2 removal were not consistent with evidence.	Recommendation 1

Appendix C: Summary of Calculation Errors

A summary of the calculation errors and the associated impacts on CORC calculation is provided in Table 7.

Table 7: Summary of Calculation Errors

Source of Error	CORC calculation	Corrected CORC calculation	Abs. Error (CORCs)	Net Error (CORCs)	Abs. Error Rate (%)	Net Error Rate (%)
Errors in LCA and CORC inputs.	864.21	857.19	7.02	7.02 OC	0.812%	-0.812%
Total	**864.21**	**857.19**	**7.02**	**7.02 OC**	**0.812%**	**-0.812%**

*OC = Overcalculation/UC = Undercalculation