

RHI Sustainability - Becoming Biomass Suppliers List (BSL) Accredited

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Introduction

There are many biomass boiler owners who have decided to produce their own woodfuel, either just to supply their own needs or also sell it commercially. For those claiming the Renewable Heat Incentive (RHI), it is important to make sure that everything in their supply chain fits the RHI sustainability criteria, and probably more importantly you have suitable evidence to prove it. This applies to both those who are just now applying for the RHI and those already long registered.

In order to claim the RHI for biomass installations, you have to prove that your fuel meets the minimum GHG footprint *and* something ambiguously named the "Land Criteria". The GHG criteria are relatively self-explanatory, the Land Criteria are aimed to ensure that all biomass fuels are socially and environmentally sustainable e.g. not sourced from land recently cleared of tropical rainforest and don't use illegal child labour.

RHI users wishing to produce their own fuel, but with no intention of selling fuel to others, have 2 Options;

1. The simpler option of registering on the BSL. This carries a fee (£25-£150 a year depending on timber source and tonnages), but only requires a relatively simple update once a year, if your basic supply chain does not change then this is a simple declaration that nothing has changed.
2. Report directly to Ofgem. Again you need to calculate the fuels GHG every quarter, and also have access to the required evidence that it meets the land criteria.

For user and producers wishing to sell woodfuel to other RHI users you *have* to register on the BSL. This technical note details the BSL application process and clarifies the terminology used.

For more information on the specific details of the RHI sustainability requirements and evidence please see our other technical note in this series; *Biomass Sustainability – Biomass Combustion*.

The BSL Application Process

The online BSL register is structured such that you register first as an organisation, then you need to register each fuel you sell or use, normally for those supplying themselves this is only one fuel.

The first option is to decide what type of woodfuel producer you are; *Self-Supplier, Producer, Trader or Producer-Trader*. Generally it

depends on where you get your timber and who you supply your woodfuel to;

- **Self-Supplier** - if it's *all* coming from your own woodlands – any woodland from which you have a right to harvest timber, through ownership, tenancy or otherwise, and is no more than 50 miles from your own sub-1MW boiler – then you can set yourself up as a "self-supplier", this requires no evidence for either GHG or land criteria, simply evidence that you have the legal right to take the timber e.g. felling licence or Long Term Forest Plan.
- **Producer** - Someone that processes raw material into a woodfuel product and sells this onto a Trader only, they cannot sell directly to end users. Most Producers need to calculate and evidence the GHG from the point the wood is grown, up to the point it leaves their premises. Also need to prove their raw material meets the land criteria.
- **Trader** - Someone that buys woodfuel products from a BSL registered *Producer* and sells this on, either another BSL registered Trader or directly to the end user. They cannot process the woodfuel in any way (this includes drying). Traders may need to produce 2 different GHG calculations depending on who they sell it to; for selling to other traders they need to calculate the GHG from the point it leaves the *Producers'* premises up to the point it leaves their own premises. For sale to end users they need to calculate the GHG from the point it leaves the *Producers'* premises up to the point it is producing heat in the boiler. Traders do not need to evidence any land criteria requirements.
- **Producer-Trader** - The category the vast majority of those registering on the BSL fall into. Someone who produces a product from raw materials *and* either sells it on to BSL traders or end users, or supplies their own boiler. Note that this is different from a *self-supplier* even if you only supply yourself, this is for those who have to buy *any* timber from outside their own holdings. Most Producer-Traders need to calculate and evidence the GHG from the point the timber is grown, up to the point it is producing heat in the boiler – except if selling to a *Trader*, then only to the point it leaves their premises. Need to evidence the raw material meets the land criteria.

If you are purchasing any timber (even if topping up your own timber from your own woodland), or selling any woodfuel you are then classed as a "producer-trader", this requires evidence of both the GHG and the land criteria.



Fuels (products)

The next requirement is to select which fuel you wish to register

The fuels available on the BSL are;

- Chip
- Pellet
- Briquettes
- Firewood

To start with it is important that we define what the BSL means by "raw material" and "product". A raw material is any woody material which needs to be further processed to be used as a fuel e.g. drying, chipping, splitting etc. A product is the fuel itself.

Assuming you are not a self-supplier you will then enter into the simplified GHG calculation section of the application process. This is split into 3 sections – production, trading and transport to end user, depending on if you are a producer, trader or producer-trader determines which bit of the calculator you complete.

Raw materials (Producers and Producer-Traders)

Next in the application process is to select which raw materials are used in the production of the fuel. Raw material available on the BSL are

• Softwood roundwood	-	Need full GHG and land criteria
• Hardwood roundwood	-	Need full GHG and land criteria
• Primary processing sawdust (from sawmills)	-	Need full GHG and land criteria
• Primary processing chip (from sawmills)	-	Need full GHG and land criteria
• Arboricultural arisings (tree surgery waste)	-	Need full GHG criteria
• Short Rotation Coppice	-	Need full GHG and land criteria
• Waste wood	-	Nothing required

You can select any number of these raw materials to be blended into the final fuel e.g. a woodchip product based on a mix 500 tonnes of softwood roundwood and 500 tonnes of primary processing chip.

For each raw material you need to state the country of origin, the amount you expect to use each year and the distance it travels from its source (the forest for roundwood and coppice) to your processing site. This is an average figure for the transport distance from all sources, to be on the safe side enter the maximum distance. The distance can be entered for road rail and ship and any combination of these.

Processing (Producers and Producer-Traders)

This section only relates to drying, specifically the proportion of material force dried. If any is force dried then you need to answer questions on the start and final moisture content of the material (wet basis), dryer type and fuel used to heat the dryer. This is the end of the production section and gives a GHG value to the end of production. This value can then be used by other BSL traders as the starting point for their calculation.

Trading (Traders and Producer-Traders)

You are able to select up to 7 different sources of products from either registered producers or traders. For example you could source chip from 2 different producers and buy some in from a trader and sell it on as single product. You can either select a

producer or trader fuel, or manually enter a GHG figure supplied. If you are a producer-trader the first GHG figure is automatically filled in with your own GHG for your own production. Then it is the same as for raw materials; you need to state the country of origin, the amount you expect to use each year and the distance it travels from its source (the producer yard or traders depot) to your processing site, for producer-traders this will be "0". The distance can be entered for road rail and ship and any combination of these.

Transport to end user (Traders and Producer-Traders)

This is an average figure for the transport distance to all customers, to be on the safe side enter the maximum distance.

Waste fuels

It should be noted that for fuels made from 100% waste raw materials do not need to produce GHG calculations or evidence the land criteria. Waste raw materials includes used wood and industry by-products but not primary processing co-products such as anything from a sawmill. Used wood includes post-consumer wood waste; By-products include joinery workshop off cuts.

If the fuel has any non-waste raw material in it (referred to as waste-virgin blends) then a GHG calculation has to be carried out and land criteria apply for the proportion of raw material that is not waste.

Once the simplified GHG calculation section is completed you now move on to the land criteria section, which asks question about your evidence for meeting the land criteria.

Under the RHI, evidence for woody biomass land criteria is categorised as either;

- **Category A Evidence** – This require you, as a supplier, to be certified with either the Forest Stewardship Council (FSC) or Programme for the Endorsement of Forest Certification (PEFC) . This is an expensive process and only really an option for the very largest forest owners and woodfuel suppliers.
- **Category B Evidence** – You yourself are not FSC or PEFC certified but you only buy FSC or PEFC timber and therefore can complete the intimidatingly titled "Risk Based Regional Assessment" (RBRA). This is the route almost everyone needs to complete.

In the online system it is important that you don't select FSC certified by mistake as this refers to Category A evidence. You need to select category B Evidence which should then prompt you to upload a Risk Based Regional Assessment.

Risk Based Regional Assessment (RBRA)

Fortunately the Confederation of Forest Industries (Confor) have produced a template RBRA for UK grown timber which is downloadable from the BSL website. The template has most of the sections for the various evidences as per the UK Timber Standard already completed with only the company details in Section 3, the evidence details in the first part of section 5 and the declaration in section 6 to complete.

The guidance for the template in section 2 suggests that section 5 does not need to be completed for suppliers using less than 750 tonnes of raw material. However as it is so simple to complete ,We would recommend that the first part of section 5 is completed by all suppliers.

In the table in section 5 for most suppliers, sourcing virgin timber or primary processing co-products, the evidence will simply be purchasing FSC/PEFC Timber from a certified supplier or buying timber from a woodland which is covered by an approved management plan (See section on evidence below). In the evidence box include details that you will check 20% of the

certifications, management plans and felling licenses. Certification, plan and felling license numbers can be checked at;

- <https://info.fsc.org/certificate.php>
- <https://www.pefc.org/find-certified/certified-certificates>
- <http://www.cms.forestry.gov.uk/publicRegister/caseSearch.jsf> for checking felling license and plan numbers (if they are not on the online register you will need to contact the relevant Forestry Commission office that issued the license or plan).

For more details of ongoing requirements for both the RHI and BSL, record keeping and evidence requirement please refer to our other technical note in this series ; *RHI Sustainability – Biomass Combustion*.

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