



## Biomass Suppliers List

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### Risk Based Regional Assessment & Mass Balance Approach

Issue 2.1

*This document should be read in conjunction with [BSL Land Criteria Guidance](#) and [BSL Evidence for Land Criteria Guidance](#)*

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## 1.Introduction

The purpose of this document, which should be read in conjunction with [Biomass Suppliers List \(BSL\) Land Criteria Guidance](#) and [BSL Evidence for Land Criteria Guidance](#), is to assist BSL suppliers and applicants in understanding the scheme’s requirements of Risk Based Regional Assessment (RBRA) and Mass Balance approach.

The RBRA allows woodfuel buyers and suppliers to provide Category B evidence, as defined in the [Timber Standard for Heat and Electricity and Wood Fuel Advice Note](#), for compliance with the wood-fuel land criteria, without the use of certification. Suppliers can upload a completed RBRA at the time of applying to BSL, in order to demonstrate there is a low risk of their being non-compliant in future with the land criteria.

To determine whether you are required to submit an RBRA, please consult section 6 of the [BSL Land Criteria Guidance](#). Suppliers anticipating that less than 100% of their virgin raw materials will meet the land criteria, will then also need to use a mass balance approach to ensure that at least 70% is both legal and sustainable, with 100% being legal. Whilst they are not required to provide mass balance calculations to the BSL Administrator at the time of applying, they must maintain this information and update at least quarterly with actual figures, such that it supports the sustainability information they submit during BSL quarterly reporting (see section 7 of the [BSL Land Criteria Guidance](#) document).

As explained in the [BSL Land Criteria Guidance](#) document, sustainability is to be calculated and reported quarterly, and suppliers must achieve the 70% sustainability compliance at the minimum, as a weighted average when measured over the course of 12 months (i.e. four consecutive quarterly reporting periods).

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## 2. Risk-Based Regional Assessment

### 2.1 Overview

Under BSL, the RBRA requires suppliers to provide sufficient credible evidence of low risk for non-compliance with all woodfuel land criteria for a defined region, from where they source their woodfuel (see [government RBRA guidance](#) for a definition of region). If suppliers can trace their material back to an area smaller than a region, for example a specific Forest Management Unit (FMU), they can provide evidence for low-risk of non-compliance with the criteria for this smaller area rather than on a regional basis.

Credible evidence could, for example, be relevant legislation and an assessment of its proper implementation and enforcement in this defined region. If credible evidence of low-risk cannot be provided for this defined region, and the region has to be considered of risk for non-compliance, suppliers would need to implement risk mitigation activities. This might include sourcing from approved contractors only; undertaking periodic forest/site visits and audits; using vertically integrated forest management operations; reducing the area from which material are harvested to demonstrate low risk of non-compliance on a local or even forest management unit level. Alternatively, they could change their sourcing practices by avoiding sourcing from an area where low risk of non-compliance cannot be shown.

**Note:** All evidence must be in English or Welsh. All official documents on which a supplier’s authorisation relies, where the original is in a language other than English or Welsh, must be accompanied by an officially certified English translation.

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## 2.2 Applicability

To determine whether you will be required to complete and submit an RBRA, please see section 6 of the [BSL Land Criteria Guidance](#) document. Any RBRA submitted as part of a BSL application must be reviewed regularly to ensure that the current raw materials are aligned to the BSL application(s) for which the RBRA is used.

## 2.3 Format for the Risk Based Regional Assessment for the BSL

Where a supplier is required to submit an RBRA, and where the virgin raw materials or fuel are sourced **exclusively from the United Kingdom**, the **supplier must use the template provided by Confor**, which can be downloaded on the [Confor website](#) or [the documents and guidance page of the BSL](#).

Where a supplier is required to submit an RBRA, but **some or all of the virgin raw materials or fuel are sourced from outside the UK**, suppliers must use a **bespoke RBRA**. Such suppliers are recommended to look at the examples in the [Risk based Regional Assessment: A Checklist approach](#) document, use government legislation and control of the supply base to complete the following template.

They must then prepare a bespoke RBRA, ensuring that each of the following sections is covered, and that the headings and format outlined below are used. They must be in the same order.

The bespoke RBRA must have the following sections:

1. Company, depot and BSL registered fuel details;
2. Introduction;
3. Definition of the supply base;
4. Flow diagram / table;

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5. Credibility requirement;
6. Sustainability requirements.

Guidance on each of the above sections, including what information is required, is set out in this chapter and covers raw materials of UK and international origin.

## 2.4 Company, depot and BSL registered fuel details

Company		
Company address		
Biomass Fuel processing sites		
Site 1	Address:	
	Site activities:	
	Products produced at site:	
	Material Supply Base for site:	
	Site Annual Capacity:	
	BSL Registration numbers:	
Site 2	Address:	
	Site activities:	
	Products produced at site:	
	Material Supply Base for site:	
	Site Annual Capacity:	
	BSL Registration numbers:	

**Note:** As the land criteria can be administered up to a company level, subject to the regional supply base not being compromised, a supplier can add further sites as required.

## 2.5 Introduction

This section will need to include a description of your business including:

- Location details;
- Average sourcing of raw materials for the fuel on the BSL;
- Distance raw material is transported.

## 2.6 Definition of the supply base

In this section, you will need to provide details of your supply base and should outline the rationale for the RBRA to be considered low risk.

Timber Standard (TS) requirement	Evidence provided
Woodfuel meets the Timber Standard for Heat & Electricity, if it originates from an independently verifiable legal and sustainable source, and appropriate documentation is provided to prove it.	

## 2.7 Flow diagram/table

This section should include a description of the sources of all the raw materials used in a BSL fuel, and how the raw materials are classified according to the woodfuel land criteria requirements. A summary should also be provided, that

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sets out how the raw materials are processed and distributed, including any control points that are required to comply with the requirements of the land criteria.

## 2.8 Credibility requirements

This section should include a table in the following format:

<b>Timber standard requirement</b>	<b>Evidence provided</b>
S1. The definition must be consistent with a widely accepted set of international principles and criteria, defining sustainable or responsible forest management at the forest management unit level.	
S2. The definition must be performance-based, meaning that measurable outputs must be included and cover all of the issues set out in S5 to S10	
S3. The process of defining sustainable must seek to ensure balanced representation and input from the economic, environmental and social interest categories.	
S4. The process of defining sustainable must seek to ensure:	
a. No single interest can dominate the process for setting or changing the policy; and	
b. No decision on the contents of the policy can be made in the absence of agreement from the majority of an interest category	



## 2.9 Sustainability requirements

This section should provide details on sustainability requirements in accordance with the table format provided below.

Timber standard requirement	Evidence provided
S5. Management of the forest must ensure that harm to ecosystems is minimised. In order to do this the policy must include requirements for:	
a. Appropriate assessment of impacts and planning to minimise impacts.	
b. Protection of soil, water and biodiversity.	
c. Control an appropriate use of chemicals and use of Integrated Pest Management wherever possible.	
d. Proper disposal of wastes to minimise any negative impacts.	
S6. Management of the forest must ensure that productivity of the forest is maintained. In order to achieve this, the policy must include requirements for:	
a. Management planning and implementation of management activities to avoid significant negative impacts on forest productivity.	
b. Monitoring which is adequate to check compliance with all requirements, together with review and feedback into planning.	
c. Operations and operational procedures which minimise impacts on the range of forest resources and services.	
S7. Management of the forest must ensure that ecosystem health and vitality is maintained. In order to achieve this, the definition of sustainable must include requirements for:	
a. Management planning which aims to maintain or increase the health and vitality of ecosystems.	
b. Management of natural processes, fires, pests and diseases.	

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Timber standard requirement	Evidence provided
c. Adequate protection of the forest from unauthorised activities such as illegal logging, mining and encroachment.	
S8. Management of the forest must seek to ensure that biodiversity is maintained. In order to achieve this there must be:	
a. Implementation of safeguards to protect rare, threatened and endangered species	
b. The conservation/set-aside of key ecosystems or habitats in their natural state	
c. The protection of features and species of outstanding or exceptional value.	
S9. The forest management organisation and any contractors must comply with local and national legal requirements relevant to:	
a. Labour & welfare	
b. Health & Safety	
S10. Management of the forest must have full regard for:	
a. Identification, documentation and respect of legal, customary and traditional tenure and use rights related to the forest.	
b. Mechanisms for resolving grievances and disputes, including those relating to tenure and use rights, to forest (or land) managements practices and to work conditions.	
c. Safeguarding the basic labour rights and Health & Safety of forest workers.	

Please provide version control, author(s) and date of issue.

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## 3. Mass Balance Approach

### 3.1 Mass Balance overview

A mass balance approach is a means to demonstrate compliance with the requirement to meet 100% legal, and at least 70% sustainable sources of virgin timber raw material, for the Renewable Heat Incentive (RHI) land criteria. The approach is classified as Category B evidence as per the [Timber Standard](#), and is defined in the [BSL Land Criteria Guidance](#) document.

Companies can adopt a mass balance approach when applying for their fuel to be listed on the BSL. Any applicant required to undertake a mass balance approach for their fuel to demonstrate compliance will also need to submit an RBRA. The RBRA should be reviewed regularly to ensure it is kept up to date.

### 3.2 Applicability

The mass balance approach is applicable to 'Category B' applicants that obtain at least 70%, but less than 100%, of their raw materials from sources that are deemed sustainable.

Operating a mass balance approach may be necessary if you:

- Do not have 100% legal and sustainable material;
- Buy from different woodfuel sources;
- Have a mix of consignments; and/or
- Have limited process to avoid mixing legal and sustainable from legal only material.

The mass balance approach does not apply to applicants that:

- Are 'Category A' as demonstrated by specific FSC/PEFC certification types outlined in the [BSL Land Criteria Guidance](#) document.

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- Hold a valid felling licence covering 100% of their raw materials and have a UK Forestry Standard compliant forest management plan; or
- Can demonstrate 100% of their raw materials are deemed sustainable as defined in the [BSL Evidence for Land Criteria](#) document.

### 3.3 Mass Balance approach in practice

The mass balance approach enables material with differing percentages of 'legal and sustainable' sources and 'legal only' sources to be mixed, whilst ensuring the correct accounting and reporting of the 70/30 threshold.

The mass balance approach can be calculated on a per fuel, per depot or by company basis as long as it is consistent with how the associated RBRA has defined your supply base and region.

There are two different ways to report this: a proportional mass balance or a non-proportional mass balance. These are described in the [Consignment and Mass Balance Approach](#) guidance.

The reporting system chosen must be consistent and transparent. The supplier will make these accounts and associated evidence available at audit.

### 3.4 Reporting

Every three months following a fuel's authorisation, BSL suppliers are required to report certain information to the BSL Administrator. This has been expanded to include land criteria. Details of the enhanced quarterly reporting requirements for Land Criteria are set out in section 7 of the [BSL Land Criteria Guidance](#) document. To complete this reporting, suppliers will need to maintain regularly-updated mass balance calculations.

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### 3.5 Selling your fuel

Any fuel supplied on the BSL will be **assumed** by the RHI participant (the end user) to be at least 100% legal and 70% sustainable. In the event an RHI claimant wishes to purchase or use fuel from a number of different sources, they may request a BSL supplier provide the **actual** ratio of legal and sustainable to legal. Where a fuel is supplied with a higher than 70% claim on it, the supplier of that fuel must:

- Make the claim on the sales documentation; and
- Have mass balance calculations to support that figure.

This will be checked at audit.

### 3.6 Mixing

Where a supplier does not register 100% of its fuel on the BSL, and mixes a BSL registered fuel or raw materials with non-BSL raw materials or a non-BSL registered fuel, that supplier cannot blend any raw materials or fuel of unknown origin. In this instance, the supplier will need to have physical separation of any raw materials or fuels of unknown origin. This will be checked at audit.

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## 4. Further Information

Links to the references used in this document are found below.

- DESNZ have four key woodfuel guidance documents on its website on which the BSL guidance is based; these are:
  - [Timber Standard for Heat and Electricity](#)
  - [Woodfuel Advice Note](#)
  - [Consignment and Mass Balance Approach](#)
  - [Risk Based Regional Assessment: A checklist approach](#)
  
- The BSL guidance documents are available on the BSL website:
  - [Land criteria guidance](#); and
  - [BSL supplier general guidance](#)

Further information can be found at:

- **Ofgem** can help answer enquiries regarding the RO scheme and RHI (domestic and non-domestic) application and reporting processes. Ofgem also provides advice on enquiries regarding fuel classification.
  
- The **Central Point of Expertise on Timber (CPET)** wrote the [Guidance for the Growers of Timber in the UK](#). Closed in 2016.
  - Web: <https://www.gov.uk/government/groups/central-point-of-expertise-on-timber>
  
- **The Forestry Commission** provides information on management plans, felling licences and sustainable forest management practices. [The UK Forestry Standard \(UKFS\)](#) is the reference standard for sustainable forest management in the UK. The UKFS, supported by its series of guidelines, outlines the context for forestry in the UK; sets out the approach of the UK governments to sustainable forest management;

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defines standards and requirements, and provides a basis for regulation and monitoring.

- [The Office for Project Safety and Standards \(OPSS\)](#) answers enquiries related to compliance with the UK timber regulation (UKTR).

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## 5. Version Control

Version	Update	Date
1.0	First published	9 <sup>th</sup> April 2015
2.0	Updates to regulation and legislation	28 <sup>th</sup> October 2022
2.1	Replaced reference to BEIS with DESNZ	23 June 2023