

**BSL Advisory Panel – Draft minutes
Meeting 25**

Time and date	10:00 – 14:00, 28 th March 2023
Venue	BEIS Conference Centre, 1 Victoria Street, London, SW1H 0ET Or Microsoft Teams
Date of issue	DRAFT

Member Name	Organisation
Julian Morgan-Jones (Chair) (JMJ)	South East Wood Fuels Ltd
Avril Jones (AJ)	Woodsure/BSL
Bruce Allen (BA)	HETAS/Woodsure
David Marchant (DEM)	DEM Logs
Duncan Mackinnon (DM)	DSHwood
Erica Burlace (EB)	Hetas & Woodsure
Gill Alker (GA)	AMP Clean Energy
Helen Bentley-Fox (HBF)	Woodsure
Jason Hubert (JB)	Scottish Forestry
John Westmacott (JW)	Guest (Land Energy)
Julia Turner (JT)	WRA
Megan Price (MP)	Woodsure
Michael Barber-Starkey (MBS)	M W Barber-Starkey
Neil Welsh (NW)	OFGEM
Poppy Airey (PA)	REA
Lucy Clark (LC)	LC Energy Ltd
Pablo John (PJ)	Wood Heat Association
Ross Lowrie (RL)	Self-supplier
Tunde Ojetola (TO)	BEIS
Francesco Kor	BEIS
Apologies	Organisation
Amy Fielding (AF)	Environmental Compliance Solutions Ltd
Alan Webb (AW)	Optimus Resource Management Ltd
Ian Tubby (IT)	Forestry Commission England
Kirsty Earle (KE)	Ofgem
Malcolm Snowie (MS)	Scot Heating Company Limited
Paul Bass (PB)	Ofgem
Richard Coulson (RC)	WRA
Steve Arnold (SA)	Effipap Ltd

1) Introduction and housekeeping

Introductions were done.

2) Minutes of the last meeting

All members agreed with the previous minutes.

3) Review of Actions Tracker

All actions were reviewed. Those closed were recorded on the outstanding actions tracker.

Actions that remained open were reviewed.

AP 20-09	Panel members to provide views to BEIS regarding novation	BSL AP	On AP Agenda	Closed
AP 23-03	BEIS to provide someone from the strategy team to come and give a talk on Biomass Strategy	BEIS	Not to be published until May. TO will invite Biomass Strategy/update at June AP	Open
AP 23-05	Email IT with questions on Preferred By Nature website.	BSL admin	Ian Tubby discussion took place. Outcomes added to AP24-07	Closed
AP 24-01	BSL admin to review waste guidance with GA and AW and add a newsletter article on this	BSL Admin	Scheduled for next newsletter	Open
AP 24-02	Gill Alker to be placed on the Finance subgroup	BSL Admin	Gill Alker invited to finance subgroup meetings	Closed
AP 24-03	Amended TOR to be circulated to panel following meeting.	BSL Admin	Sent with papers for AP	Closed
AP 24-04	Extract quarterly tonnage table, Cleanse of non- conformances and extract trends, Share the data/figures ahead of the meeting, with explanations of what the data means	BSL admin	BSL report included in meeting papers	Closed
AP 24-05	Include /improve reported tonnage in period by origin year to year, for next meeting	BSL admin	Included in slideshow	Closed
AP 24-06	Share the unique pellet tonnage across the UK with BEIS	EB	Contract meeting January 2023	Closed
AP 24-07	BSL admin to develop a specific risk register for origin of pellets	BSL admin	Proposal to BEIS to be approved	Open
AP 24-08	Communicate to BEIS, the importance of the pellet fuel quality (ENplus filter) Search option should be returned to the website	BSL admin	Communicated in January contract meeting	Closed
AP 24-09	List of Enhancements for BSL Portal plus presentation or video of the portal to be brought to next meeting.	BSL admin	Included in this AP	Closed
AP 24-10	Dates 2023 meetings to be set and invites to be sent out. Location of next meeting to be agreed with BEIS – proposal to be London at BEIS.	BSL admin	Done	Closed

Extra action details

AP 23-03: BEIS confirmed that a different team is working on this action and that they are encouraged to engage with this group ahead of publication. The team have already done at least one consultation and one call for evidence and are readily engaging with organisations. It was recommended that the REA, for example, engage with the AP group and send recommendations to TO.

- AP 24-07: This point is not just around pellets, it is also about importing of timber and the risk and due diligence around all these fuels. Short term strategy has been proposed to BEIS, longer term strategy still to be developed.
Linked to AP 23-05 where it was noted that the Preferred by Nature website is not being updated by the EU. This website is used by OPSS (Office for Product Safety and Standards) to risk assess and due diligence but can no longer be used. It has been incorporated in AP 24-07.
- AP 24-08: BEIS confirmed that the UK Pellet Council were happy that the EN Plus search be removed from the BSL portal, for the 1-year suspension period. The decision still stands, and it remains removed. The BSL website guidance was improved to make it very clear that if your boiler requires EN Plus, then you still should source EN Plus pellets from the suppliers. Even though the search filter is not there, the onus is on the consumer to make enquiries.

4) Fuel Quality and Waste Subgroup Recommendations

- The roles of the Woodsure audit and BSL audits were discussed. (On agenda)
- FQ implementation as well as FQ suspension were also discussed. (On agenda)

RL commented on some feedback he had received from self-suppliers about the article in the BSL newsletter:

- Generally, people felt that FQ implementation did not go well and that it was too onerous on the smaller self-supplier.
- Impact of the 10-year meter changing. People feel that this is not what they signed up for, when they signed up for BSL. Now the meters either have to be replaced or recalibrated. Both options are costly, especially for the smaller operators such as Bed and Breakfasts, self-catering cottages, etc. Recalibration means down time over and above quite a large cost. Raised in the context of disproportionate impact on the lower end of the market (The same issue as the FQ impact).

Proposal to suspend the FQ subgroup.

- To avoid repetition of work and discussion and post FQ implementation it was proposed to suspend the FQ subgroup.
- All agreed to suspend the FQ subgroup.
- JMJ thanked RL for chairing the FQ subgroup.

5) Finance Subgroup Recommendations

Feedback

- The budget for the coming financial year was presented.
- The budget for last year was not achieved, due to high numbers of both suppliers and fuels being removed during the fuel quality implementation. The new (current) budget is based on actual income and contract activity year end December 2022.
- The new budget has decreased by 8% in terms of income based on what was achieved last year, but the projection of surplus has improved.
- There was a small deficit for the last financial year, and as per the contract, this deficit gets recouped by any surplus made this financial year.

RHI/BSL

- As the RHI is closed for new business, and therefore over a period of time people buying fuel will no longer require BSL registered fuels. This will predominantly affect the domestic participants as the Domestic RHI is only for 7 years. There will come a point where the contract's viability we will have to be considered. This is being monitored.

- The commercial customers and those supplying the Non-Domestic RHI will continue requiring BSL registered fuels for up to 20 years.
- Adding value to our auditing schedule in consideration of the EN Plus audit, the Woodsure audit and the BSL audit was discussed. This was early discussion and taken away to explore. Raised due to the costs within the audits.
- LC & GA: By design, BSL will taper off, and we need to be ready, for fuel quality outside of RHI i.e.. develop the scheme intention. The novation could cause a longer-term way of mitigating risk and creating reputation for biomass fuels into the future. Wood fuel sustainability and quality remains the right thing to do, and with a wider group for the UK and the data the BSL has, can influence and show that the biomass sector has a reputation of doing the right thing.
- BA commented: Woodsure sees BSL as the future of biomass and would be happy to continue running the BSL, as it is the future of biomass that is at stake. Biomass standards should be met across the board, regardless of RHI. Perhaps build a sustainable scheme for the future if that's what the government desires. Government has committed to biomass for the next 20 years via RHI and BSL is supported via the boiler upgrade scheme. BSL is a foundation to build on. Woodsure is committed to ensuring this future for biomass to being cleaner and safer, and we would like to do it with the government and the group.
- BA confirmed that the government (DEFRA and BEIS) are increasing scrutiny into much more than just particulates. There is a place for BSL with the help of all/organisation to be able to carry on with what we are doing. JW: Biomass sustainability standards need to be maintained and are critical to this future.
- RL: There is a need to decarbonise across all sectors of the economy, including heating and power generation. Need the carbon from and lock it into the ground and this points to larger bioenergy with CCS. Another option is turning it into hydrogen. All of these, BSL can have a role in.
- We have the foundation, but we need to reach out. We need to present a solution to all issues, perhaps a re-brand. Perhaps using the word sustainability, as Biomass Suppliers List (BSL) doesn't tell people what we are doing.
- JMJ: Would prefer not to be addicted to government strategies. If govt hadn't stepped in last year in the energy crisis with the price cap on electricity and gas, more people would have stayed or actually installed biomass.
- JMJ: Future for BSL - Proposals and recommendations can be passed across to BEIS.
- TO: Beyond BSL – AP is highly respected by government and recommendations are always welcome. Allocate time in the next AP meeting. It would be helpful if people to bring contributions/ideas to the meeting, so that we can have a structure.

New actions

AP 25-01	Allocate time in next AP meeting. Add to the agenda 30 -60 mins. <ul style="list-style-type: none"> • Novation – What to do with BSL? • What to do with quality, sustainability and the and the biomass market? 	HBF
AP 25-02	Send all thoughts and ideas to HBF – future of biomass and BSL and what it looks like. <ul style="list-style-type: none"> • Novation – What to do with BSL? • What to do with quality, sustainability and the biomass market? • Other thoughts and ideas 	All

6) Pellet FQ suspension: Impact on equipment, number of fuels & comms. AP members to bring evidence of issues if possible.

Overall pellet –

- tonnage pellets sold to consumer in 2022 was down by 15% on the previous year. Overall reported tonnages sold to consumer is down 19%. There have been discussions over discrepancies, which will be looked into. Pellets represents 33% of all fuel sold to consumer by volume in 2022 and 2021. Chip 59% in 2021 and 61% in 2022, and firewood was 6% in 2021 and 4% in 2022.

- Chip has increased in volume sold by 2% and firewood has by 2%. Consumer is down by 15% and industries down 24%.
- There is a 13% decrease in the number of pellet fuels listed on BSL in Q4, compared to Q4 2021.
New Pellet Supply to BSL since Russian Sanctions
- We have had about 50 000 tonnes of new pellet supply reported as sold since the sanctions. The potential was 800 000t, which is the amount that was indicated as annual tonnage at the point of application.
- There were a large number of new applications that came through post sanctions, with huge potential volumes, but we're seeing very little activity in terms of reported tonnage from the new applicants.
- Only just over 2000 tonnes of new pellet have reached the consumer since sanctions.
No Fuel quality (FQ) –
- There is a potential of 220 000t without FQ since sanctions and we have had less than 1% of that reported through either consumer or industry. Most of the applications coming through are either people trading bagged or who have EN Plus already.
- A comparison of pellet application by origin before and after sanctions, and an overarching view of reported total tonnage of pellet by quarter and origin was presented.
- Reinstatement of FQ requires discussion and planning to ensure that we can support the industry and the consumers. Factors for consideration:
 - Stakeholder communication and key messages
 - Long term implications of poor-quality pellets on appliances
 - Liability for additional audits and checks – adapt audit for pellets?
- There will be a newsletter going out next month.
- We are proposing that suppliers should not stockpile fuels that do not have FQ, because following the 23rd November 2023, they will not be able to sell it without a BSL number. Due diligence checks will take place to make sure that they are EN Plus.
- The monitoring of pellets is ongoing. Russian pellets do not have FQ. Brazil has audits to be conducted or already conducted on suppliers. Turkey has no more pellets listed.
- Due to the poor quality of pellets, do we think there's going to be any need for some extra monitoring? We have the laboratory that we could do pellet durability testing in. We would have to buy the equipment, but we can do it. Knights could do pellet durability and chemical tests.
- Some of the smaller boilers have had problems with poor FQ.

New action

AP 25-03	Relook at the slide 'Increased New Pellet Supply and the Decreased Pellet supply'	EB –completed - the table is deemed to be correct with the dominant view shown i.e. increasing or decreasing. Post meeting – confirmation slide is correct as a snap shot.
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7) BEIS Update

BEIS name change

- BEIS have had a name change, due to it being split into 3 different departments
 - BEIS was restructured into the following:
 - Department of Energy Security and Net Zero – We fall under this department
 - Department of Science, Innovation and Technology
 - Department for Business and Trade

Fuel Quality - Policy and Timelines

- The pellet FQ was suspended for scheme participants to use EN Plus A1 certified pellets for 1 year, from 23rd November 2022 - 22nd November 2023. It was thought that it could help stabilise the market, but there were still concerns. The quality of the fuel was a lower quality prior to April 2022, as EN Plus wasn't a requirement, but rather a recommendation.
- Ministers, Scottish Government, etc. agreed with the suspension.
- EN Plus will be required for pellets again on the 23rd November 2023, unless the Secretary of State decides otherwise. This applies to Woodsure as well.
- Is the suspension still needed? Provide evidence to TO as to whether or not you think the suspension is still required. This will then be taken to the ministers. (By May)

Potential Compliance Action

- Fuel Quality
 - All the fuel quality except pellet must adhere to for quality requirements and must be certified by Woodsure or an equivalent body. KIWA reviews the equivalent bodies, and there are no equivalent bodies, so Woodsure is the certified body.
 - Compliance actions and maintenances checks were introduced on 1st April 2022 for all to comply. One year is now up, so OFGEM have started doing their checks.
 - Self-reporters are going through compliance action by OFGEM at the moment. Note that the FQ suspension is only for pellets.
- Annual Maintenance checks
 - All biomass boilers must be maintained annually in accordance with MCS 040 (the standard set by industry), and must be certified by HETAS or an equivalent body. (Introduced in April 2022)
 - Compliance actions and maintenances checks were introduced on 1st April 2022 for all to comply. One year is now up, so OFGEM have started doing their checks.
 - It is annual maintenance checks, so it is required for the remaining part of the scheme.
- Meter Recalibration
 - As per the legislation, all metres on the scheme must be recalibrated every ten years or as specified in the manufacturers' instructions, whichever is the sooner.
 - Representation in being made, but if anyone would like to direct representation to BEIS, please send it to TO.

NDRHI Final Applications

- NDRHI Scheme was closed to new applications as at 31st March 2021. This was extended to 31st March 2022 due to COVID, and then extended again to 31st March 2023. New applications are therefore now closed.
- Representation has been made to the departments to leave it open a bit longer. This is being looked at and once the decision has been made, they will let us know.

BSL Contract

- The original contract was awarded to Woodsure on 2 + 1 + 1 basis. The 2 years is up now, and the contract has not gone out to tender at the moment.
- The contract is currently being reviewed. Aiming to improve the audit bit.
- Please send any comments to TO by mid-April.

Other Issues – Biomass Strategy

- In development the sustainability, the team has been holding sustainability workshops, has not consulted with individual companies and has consulted with trade organisations for example REA, ADBA, Biomass UK, etc.
- Working with them on a heat chapter and have made representation about the needs of sustainable biomass around RHI, as RHI is going to still be around for the next 18 years.

Air Quality Strategy

- DEFRA is currently working on a new air quality strategy, considering long term way to reduce negative air quality emissions and to set a new target ahead of 2040. We're working with them to make our position clear. They may be coming out in their public consultation soon.
- Congratulations to all involved with the BSL website. The Cabinet Office assessed 75 websites, and only BSL received the highest score.

Questions

1. Recalibration: How to get recalibration changed for small outfits?
[The recalibration is a requirement in the regulations. The legislation set in 2010 has the requirement for recalibration.](#)
2. FQ: Not everyone is aware of the legalities of burning wood. Quality of wood fuels to end supplier, i.e., pubs? Everyone should be forced to use the standard.
[The Ready to Burn scheme regulate all fuel sold in 2 cubic meters or less, and it is for domestic use only, and in England only at the moment.](#)
[\(There is a regulation on this, but it is on the supplier and not the end user. There is a need to tackle the unregulated bit. The emissions is being dealt with in the environment approval plan\)](#)
3. Is there enough maintenance available around the country?
[Yes, there is a group that looks after the biomass maintenance scheme. The report shows the breakdown of the number of operatives that are qualified to do the maintenance and the number of businesses and how many operatives they employ. There is a calculation of how many boilers they can do in a year and that at the moment we've reached the point where we can service the demand.](#)

Representation and comments can be sent to:

Email directly to RHI@beis.gov.uk

Write to you Member of Parliament, who in turn would write to the Minister.

New action

AP 25-04	Provide evidence to TO as to whether or not you think the suspension is still required. (By May)	All
AP 25-05	BSL contract is currently being reviewed. Please send comments on the improvement of the audits to TO.	All
AP 25-07	Verify if the biomass strategy is only England, or does it include Scotland as well.	TO

8) BSL Activity

- The number of listed Fuels have reduced from February 2022 to February 2023, which is also reflected in the number of suppliers. This was down to FQ and a data cleanse.
- The business size representation and the year applied was discussed. A small enterprise is under 50 people.
- The number of fuel applications submitted and removed throughout the year was presented. The highest was in Q2.
- An overview of the number of supplier and fuels audited. 5% of the suppliers have been audited since July 2022, and 6% of the fuels. It may be helpful to display the targets on this slide as well.
- Major and minor non-compliances. The major non-compliances are aware that they need to reapply to BSL. The majority is application errors.
- Add waste to the 'Last 5 full Quarterly Declarations' slide and send a slide update. Last 2 columns are irrelevant.
- Helpdesk call and emails are still high.
- Add a ratio/average to on the 'Major and Minor Non-compliances' slide by quarter, to show trends.

Detailed information can be seen on the presentation.

New actions

AP 25-08	Add waste to the 'Last 5 full Quarterly Declarations' slide. Remove last 2 columns and send a slide update	EB
AP 25-09	Add an average to on the 'Major and Minor Non-compliances' slide. Add target no. of audits to annual tally.	HBF

9) BSL New Portal Presentation

- At the point of the tender, we understood that the website and portal needed a complete replacement.
- A significant amount of data cleansing has been done. We inherited a considerable amount of data that we assumed income against, which was not realised and therefore cleansed.
- We are more robust in our operations in terms of administering registrations and as the team is knowledgeable, they do not require scripts.
- The portal is an accurate, secure database containing details of suppliers, communication notes and their applications. The accuracy of the portal is something we've worked on as a team in BSL.
- It's a public browsable interface providing details of suppliers, not including self-suppliers.
- An online application portal with a greenhouse gas calculator
- There is a FAQ section and eligibility requirements list.
- Supplier guidance, and complaints/appeals procedure.

- We used our existing IT provider to provide the update and went through a prolonged period of scope development, due diligence, cleansing, etc, so that we were working with an accurate picture.
- The project was delayed due to the interruption of fuel quality implementation and was launched in November 2022.

- Developed and tested the new service in a test environment.
- Carried out quality assurance testing regularly.
- Had appropriate monitoring in place, together with a plan to respond to problems.
- Worked to be able to deploy changes, without significant downtime.

- Most enhancements and bugs have been completed, but there are still some being looked at and tweaked.
- Continuing with:
 - Complaints
 - Customer survey
 - Cleansing the content
 - Streamlining and removing information on the home page
 - Use hyperlinks
 - Document and guidance tab
 - Use of visual imagery to engage
 - Permission under 'Find a fuel'
- The challenges were prioritising the bugs. The scope, as the more we knew, the more we wanted. Logic changes effecting other areas.

- There were some bugs that impacted the BSL user after the launch, although the system has not been down since the launch.
- There has been an increase in the users on the portal. People that had been engaging were still engaging with us.
- We had to fill in the comprehensive audit.

10) Ofgem Update: HABMS and SR

- Annual maintenance: annual declaration register has now been updated the participants can now declare that they have met their obligations. Make sure the checks are carried out and that they retain their evidence accordingly. This needs to be done by the end of their payment year.
- Wood fuel quality: taking a targeted auditing approach for self-reporters and will need to be Woodsure certified and will be asked for evidence.
- Meter recalibration: This is still being considered but will get back to us in due course.

11) BSL External Audit purpose and outcomes

- Measurement of the BSL administration against the requirements as laid out in the tender.
- Provide BEIS with the assurance that we are meeting the requirements.
- Provide BSL administrator with major/minor/recommendations for improvement.
- There were no majors, 3 minors and 5 recommendations. The summary of these were discussed and will be sent out.
 - Improvement around audit.
 - Improvement around suspension, if they don't do anything about their suspension, they will be removed.
 - Woodsure's procedure document found the monthly BSL Contract Report. The procedure does not match current practice – deadlines for non-conformances. The analysis of majors and minors and the speed of which actions are closed is included in our monthly report and it's been reported since our new update procedure in November.

New actions

AP 25-10	Send out a copy of the External Audit Action Update	HBF
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12) Progress update from REA on the implementation of fuel quality report

- The survey went out at the end of January, and 13 responses were received.
- Did interviews with 9 organisations/businesses. The only key stakeholder who didn't want to take part was OFGEM.
- From the survey that went out, the average rating that people gave the FQ implementation was 3.4 out of 10.
- There were many strong opinions and things went wrong from both sides. There were people that refused to engage, engaged too late, or didn't think the rules applied to them.
- There were also those that did engage, but felt the comms weren't sufficient, and the advice that was given wasn't explicitly clear or simple for what they needed to do.
- The report is currently being written up. The key section will be the recommendations towards the end of the report. (Self-reporters or self-suppliers?)

13) AOB and discussion

- No other business

14) Closing Remarks, date and location of next meeting

- In closing, the chair thanked all.

Next meeting

Location: Online

Date: 8th June 2023

Time: 10:00 – 14:00