

### **Biomass Suppliers List**

### Supplier Question and Answers Document

Issue 3.2

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#### **1. Background and Policy**

#### 1.1 What is the Biomass Suppliers List?

The Biomass Suppliers List is a scheme which ensures that all woodfuel registered on it are from source(s) that are at least 70% sustainable and 100% legal. Once an applicant's application has been approved, they are provided a BSL authorisation reference number which will be in the following format: *BSLXXXXXX-XXXX'*. The BSL is a scheme that provides RHI participants with a simple way to demonstrate that their fuel complies with the RHI's standards. From 1<sup>st</sup> April 2022, where required, fuels will also need to be certified under a fuel quality scheme.

#### 1.2 What are the eligibility criteria?

There are 3 criteria

The RHI Greenhouse Gas (GHG) criteria. Suppliers registering fuel(s) on the List will be required to verify that the emissions from the cultivation, processing and transport of the biomass fuel achieves a saving of at least 60% against the EU fossil fuel average for heat, when used in a boiler which achieves an average of 70% seasonal efficiency (≤ 34.8 g CO2 per MJ), calculated using the life cycle assessment methodology set out in the European Commission's 2010 report on 'Sustainability requirements for the use of solid and gaseous biomass sources in electricity, heating and cooling SEC 2010 65 Final'1.

<sup>&</sup>lt;sup>1</sup>http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:0011:FIN :EN:PDF



The GHG criteria were consulted on in July 2012<sup>2</sup> and the finalised criteria were announced in February 2013<sup>3</sup>.

- The Land criteria. Suppliers registering fuels on the List are required to demonstrate how the wood fuel was sourced and how this meets the requirements as laid out in the Timber Standard for Heat and Electricity<sup>4</sup>. The land criteria were introduced for RHI claimants from 5<sup>th</sup> October 2015. Please see Land Criteria Guidance for more information on how to comply with the land criteria.
- Fuel quality criteria (where required): From 1<sup>st</sup> April 2022, fuels must be certified by a recognised scheme.
  - All pellets must be certified as ENplus A1 standard<sup>5</sup>.
  - All other woodfuel must be certified by the Woodsure Certification Scheme or an equivalent certification scheme as meeting the standards EN 15234-1: 2011(10), ISO 9001: 2015(11) or EN ISO 17225-4: 2014(12) or an equivalent standard.

The BSL currently assesses suppliers against the above Greenhouse Gas criteria, land criteria and from 1<sup>st</sup> April 2022 the fuel quality criteria (where required).

<sup>&</sup>lt;sup>5</sup> Suspended for 12 months from 16<sup>th</sup> November 2022

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<sup>&</sup>lt;sup>2</sup>https://www.gov.uk/government/uploads/system/uploads/attachment\_data /file/43165/5883-rhi-certainty-performance-cons.pdf

<sup>&</sup>lt;sup>3</sup>https://www.gov.uk/government/uploads/system/uploads/attachment data /file/128679/Gov response to non domestic July 2012 consultation -

<sup>26 02 2013.</sup>pdf

<sup>&</sup>lt;sup>4</sup> <u>https://www.gov.uk/government/publications/timber-standard-for-heat-</u> <u>electricity</u>



For further information, please contact DESNZ.

#### 1.3 What other criteria are there to get on the list?

All applicants must agree to the scheme Terms and Conditions, which include requirements around reporting, agreement to be subject to periodic audits, and the provision of proofs of purchase in the form of invoices or receipts with information about the fuel on them.

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#### 2. Deciding whether to apply

2.1 How do I know whether I am a Producer, Trader, Producer-Trader or Self Supplier?

The full definitions for these terms are contained in the <u>Applications and Audit</u> <u>Guidance document.</u>

#### 2.2 What is the difference between a raw material and a fuel?

Raw materials are set to undergo further processing (e.g. cutting, drying, chipping) before they are used in a boiler. A fuel is something that will not undergo any further processing before it is used in a boiler.

The BSL is not a list of raw materials, it is a list of fuels, and suppliers of raw materials should not seek to register those raw materials. The BSL only approves woody fuels and has four fuel types: firewood, chip, pellet and briquette.

2.3 I supply roundwood / logs to someone who processes them into chip or cuts and dries them further before use or sale to consumers / traders. Should I register on the BSL?

No. You are supplying raw materials which will undergo further processing into fuel before they are used. Unless you are supplying a fuel you should not make an application to the BSL. However, those on the list will require you to supply the distance the timber has travelled, demonstrate how it meets the land criteria and fuel quality requirements where required.

### 2.4 I buy in roundwood from another supplier, which I cut and dry for sale to consumers. Am I a Producer, Trader, or

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Producer-Trader, and does the roundwood I buy need to be on the BSL?

Yes. You should register as a Producer-Trader, as you are processing raw materials (the roundwood) into fuel (firewood) and selling that fuel to end consumers. The BSL is a list of fuels, not raw materials, so the raw materials you buy do not need to be BSL registered. You should however be able to demonstrate chain of custody from the raw material source and provide appropriate information associated with your raw materials should you be audited by the BSL Administrator. If you also sell to traders you do not need to also register as a producer, the trader can use your producer/trader BSL number to assist them with their meeting of the three BSL criteria (greenhouse gas, land and fuel quality where required).

2.5 I am a non-domestic RHI participant, and I buy in roundwood from another supplier and chip them myself for my own use. Am I a self-supplier, and if not, how do I demonstrate that my fuel meets the criteria for the BSL?

Non-domestic RHI participants will have two methods of demonstrating compliance with the greenhouse gas, land and fuel quality (where required) criteria:

- (1)Self-reporting directly to Ofgem against the criteria click <u>here</u> for more information.
- (2)Sourcing fuel from the BSL.

Self suppliers must meet the self supplier definition of the source of the raw material being within 50 miles of your boiler, you have the legal right to that timber and meet the fuel quality criteria (where required). If you are buying in any raw materials and processing those raw materials into fuel to use yourself, you are not a self-supplier and cannot register on the BSL as a self-supplier. If you wish to use the BSL to demonstrate compliance with the sustainability criteria, you are able to register on the BSL as a producer-trader as you are processing raw materials into fuel for use by an end consumer (in this case

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yourself). You do not need to be listed on the BSL 'Find a Fuel' register if you do not wish to (select the opt-out within the application form), and will not need provide proof of purchase of fuel in the form of receipts or invoices but should demonstrate legal ownership of the raw materials through invoices, but for the purposes of demonstrating compliance to Ofgem, you are asked to retain proof of the quantity of fuel they are using is authorised on the BSL, and are recommended to keep this in the form of a log (within or alongside the existing RHI fuel records which you are already required to retain) showing your BSL authorisation mark, number, fuel type, quantity or volume produced in tonnes/kg/m3/net heat/gross heat (on an ongoing basis), and moisture content (% on a wet basis).

2.6 I have my own woodland and process this timber myself for use in my own boiler. However, I also purchase extra roundwood and process this myself to supplement my own supply. Am I still a Self-Supplier?

As set out above, if you are processing raw materials (roundwood) bought in from elsewhere into fuel, and wish to use the BSL to demonstrate compliance with the sustainability criteria (as opposed to self-reporting to Ofgem), then you should register as a producer-trader. You can include the timber you source from your own woodland as a raw material within this application, and do not need to do a separate self-supplier application.

You should keep records of all timber you process including the quantity that is your own.

2.7 I want to become a Producer. Producer, Producer-Trader or Producer-Trader who plans to claim RHI for burning some of the fuel I produce / trade. Do I need to register as a Self-Supplier as well?

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You can register as a Self-Supplier as well for that, but you don't need to. There will still be reporting requirements to Ofgem for the fuel you burn yourself so as to demonstrate compliance, once the RHI Biomass Sustainability regulations come into force. You will need to retain proof that the fuel is authorised on the BSL, and you are recommended to keep this in the form of a log (within or alongside the existing fuel records which a Producer-Trader / Trader is already required to retain) showing:

- BSL authorisation mark
- BSL authorisation number
- Fuel type and classification
- Your fuel quality management (where required)
- Quantity or volume produced in tonnes/kg/m<sup>3</sup>/net heat/gross heat (on an ongoing basis)
- Moisture content (% on a wet basis)

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#### **3. Applications Process**

#### 3.1 How do I apply?

Please visit <u>http://www.gov.uk/register-biomass-supplier</u> Further information can be found in the <u>Applications and Audit Guidance</u> <u>document.</u>

# 3.2 What do I do if I cannot apply online / do not have internet access?

We can accommodate this but it may take a little longer than applying online. Contact the BSL Helpdesk for further guidance and support.

#### 3.3 How do I get in touch with you?

You can contact the BSL Administrator via telephone or email: Phone: 01684 215253 Email: <u>bslhelpdesk@woodsure.co.uk</u>

#### 3.4 What does it cost to join the list?

The fees to apply and ongoing costs to be authorised on the BSL vary depending on what supplier type you are and whether you are a company. The breakdown of the fees is in the <u>Application and Audit Guidance document on</u> the BSL website.

#### 3.5 How long will my application take?

Further information regarding timescales can be found in the <u>Applications and</u> <u>Audit Guidance document.</u>

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### 3.6 In a supply chain, is there a particular order in which the Producer and the Trader should register?

If you are a Producer, registering early will mean Traders applying subsequently can indicate to us that they are sourcing fuel from you, and that way they will have to provide less information. This may save you receiving similar queries from multiple Traders.

For Traders, while we recommend applying early, you may wish to consider encouraging your Producer(s) to register first. Alternatively, you can register all the information yourself<sup>6</sup> but you will likely need to source some of it from the Producer, and be able to grant our auditors access to the Producer if requested.

#### 3.7 What if I'm part of a complex supply chain?

- National brands. If you act as a 'brand name' national Trader, never actually handling the fuel yourself, you will still need to register each fuel and depot that you use, in order to be issued with the Mark for each fuel.
- Multi-link supply chains: We are open to applications from any commercial model. The simple proviso is that the company / companies in the supply chain who should apply are those who can provide all the required information, control changes to it, report periodically, and grant full audit access on request by the BSL Administrator. Remember that

<sup>&</sup>lt;sup>6</sup> A greenhouse gas calculation using the B2C2 calculator (https://www.ofgem.gov.uk/publications-and-updates/uk-solid-and-gaseous-biomass-carbon-calculator) or equivalent may be required if you choose to do this. You must obtain the information that you need from your producer and provide this evidence as part of your application.

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anyone advertising or selling to the end customer will need to be licensed directly by the BSL Administrator to use the Mark.

#### 3.8 What fuels are covered?

Pellets – virgin, waste or waste virgin blend Briquettes - virgin, waste or waste virgin blend Chip – virgin naturally seasoned, virgin force dried, waste, waste virgin blend Firewood - virgin naturally seasoned, virgin force dried, waste, waste virgin blend Thermally modified – pellets, briquettes, chip Thermally modified waste – pellets, briquettes, chip

### 3.9 Some of the raw materials are naturally seasoned and some force dried – which fuel type should I select?

If any proportion of the fuel's raw materials is to be force dried, then you should select a force dried fuel type. You will then be able to enter how much is naturally seasoned and how much is force dried.

#### 3.10 Can I use waste or waste blend?

Waste and / or waste blend is acceptable as a fuel but you still need to apply to the BSL Administrator in the same manner as for other fuels. There may be additional evidence requirements at the application stage, and specific periodic reporting requirements in relation to waste.

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3.11 How do I measure the volumes of raw materials and fuel that are requested in the application process?

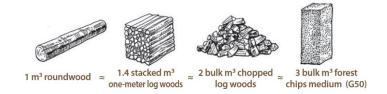


Image courtesy 'The Wood Fuels Handbook' by AEBIOM http://www.aebiom.org/IMG/pdf/WOOD FUELS HANDBOOK BTC EN.pdf<sup>7</sup>

Raw materials

- Roundwood can be in tonnes or in cubic metres. Cubic metres are always estimated as per the Forestry Commission blue book.
- Chip and sawdust loose (not compressed) m<sup>3</sup>. This can be measured using a bucket with a known m<sup>3</sup> or lorry with a known volume.
- Waste wood volume should rarely be used; weight is a more acceptable measure.

Fuel

- Firewood you should quote m<sup>3</sup> in loose cubic metres, not stacked. This should be measured using a bucket with a known m<sup>3</sup> or lorry with a known volume
- Chip loose (not compressed) m<sup>3</sup>. This can be measured using a bucket with a known m<sup>3</sup> or lorry with a known volume
- Pellet and briquette volume should rarely be used; weight is a more acceptable measure as the product is homogenised and moisture content controlled.

<sup>&</sup>lt;sup>7</sup> Caution: Although The Woodfuels Handbook is a very useful document, the timber densities it contains are based on European averages. We would recommend that you use densities from the country your timber is sourced from for example, Forestry Commission for those in the UK.

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# 3.12 Are non-UK-based applicants treated equally to UK-based applicants?

Yes. Access to the list for both UK and non-UK-based applicants is treated equally. The criteria are exactly the same.

#### 3.13 Where do I find the B2C2 calculator?

https://www.ofgem.gov.uk/publications-and-updates/uk-solid-and-gaseousbiomass-carbon-calculator

#### 3.14 How do I use the B2C2 calculator?

The Ofgem website contains both the calculator and associated guidance document: <u>https://www.ofgem.gov.uk/publications-and-updates/uk-solid-and-gaseous-biomass-carbon-calculator</u>

3.15 What if a member of the supply chain (e.g. a Trader) purchases authorised fuel from another member of the supply chain (e.g. a Producer), which subsequently has its authorisation revoked?

This would represent a material change to the fuel that the Trader was authorised for under BSL, and the Trader must therefore contact the BSL Administrator and apply for new authorisation reflecting where they will in future be procuring their fuel from.

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#### Version Control

Issue No.	Amendment Details	Date
1.0	Final Version Published	30.04.2014
1.1	Minor amendment made to explain origin of the Land Criteria	06.05.2014
1.2	Addition of question regarding Suppliers who also wish to burn some of their own fuel	23.05.2014
1.3	Document layout changes, and addition of information about ray materials	10.06.2014
1.4	Addition of questions regarding DECC consultation	16.06.2014
1.5	Typographical adjustments	26.06.2014
1.6	Update on DECC consultation, further information on BSL Authorised Mark and launch date for public facing list of fuels	13.08.2014
1.7	Consumer-focussed questions removed to a separate document, this document re-titled to specify that it is the Supplier Q&A	24.09.2014
1.8	1.3 and 3.17 updated to reflect expectation that regulations will apply from autumn 2015	17.11.2014
1.9	Updated land criteria information: 1.2, 1.3, 3.16, 3.17	09.04.2015
2.0	Updated to include reference to BSL fees in section 3.4	29.12.2016
2.1	Updated 3.12 Are non-UK-based applicants treated equally to U based applicants?	17.01.2018
2.2	New administrator updated	01.07.2021
3.0	Updated information and fuel quality introduction	31.03.2022
3.1	Updated information following fuel quality suspension for pellets	28.10.2022
3.2	Replaced reference to BEIS with DESNZ	23.06.2023

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