



Biomass Suppliers List

Supplier Fuel Quality Regulations FAQs

Issue 1.5

This FAQ document is intended to answer questions for suppliers registered on the BSL associated with the fuel quality regulations published on 25th January 2021 and has been a requirement since 1st April 2022 and the subsequent suspension of fuel quality for pellets from 18th November 2022.

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1. Background and Fuel Quality Policy

1.1 What do I need to do with regards to fuel quality for my fuels?

The legislation relating to the Domestic and Non-Domestic RHI was amended in January 2021¹. This applies to all BSL applications from 1st April 2022:

- All BSL registered fuels must be certified by a recognised certification scheme² to specified fuel quality standards.
- All pellets must be certified ENplus[®] A1 standard (suspended for 12 months from date of issue of this document).
- All other woodfuel must be certified by the Woodsure Certification Scheme or an equivalent scheme.
- Fuels derived from waste wood are exempt.

See Figure 1 on the next page, flow diagram to see what to do next.

UPDATE: As of 17/11/2023

The fuel quality suspension for **pellets only** is due to be lifted after the period of 12 months has passed. The requirement for fuel quality certification for pellets is required as of 23/11/2023 All requirements for other fuels with regards to fuel quality and sustainability criteria remain the same. For reference regarding the suspension, following an appropriate consultation process, made necessary by a global shortage of quality pellet supplies because of conflict between Russia and Ukraine, the UK Government published its response:

¹ Schedule 4 A of the RHI regulation can be found here

<https://www.legislation.gov.uk/ukxi/2021/76/regulation/39/made>

² The schemes that have been recognised in the legislation are ENplus for pellets and Woodsure Certification Scheme. The legislation allows for equivalent schemes to be approved, but this must be assessed by [KIWA](#), an independent organisation appointed by DESNZ. At the date this guidance was released there were no appointed equivalents. See the BSL website for approved equivalents.

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"We are grateful for the valuable responses to this consultation. The government now plans to implement a 12-month suspension to the fuel quality requirement for RHI participants using wood pellets specified in Schedule 4A, paragraph 2. We are confident that a 12-month suspension strikes the right balance to make additional supplies of wood pellets available for this winter. In turn it should also serve to mitigate against potential price rises due to a lack of supply.

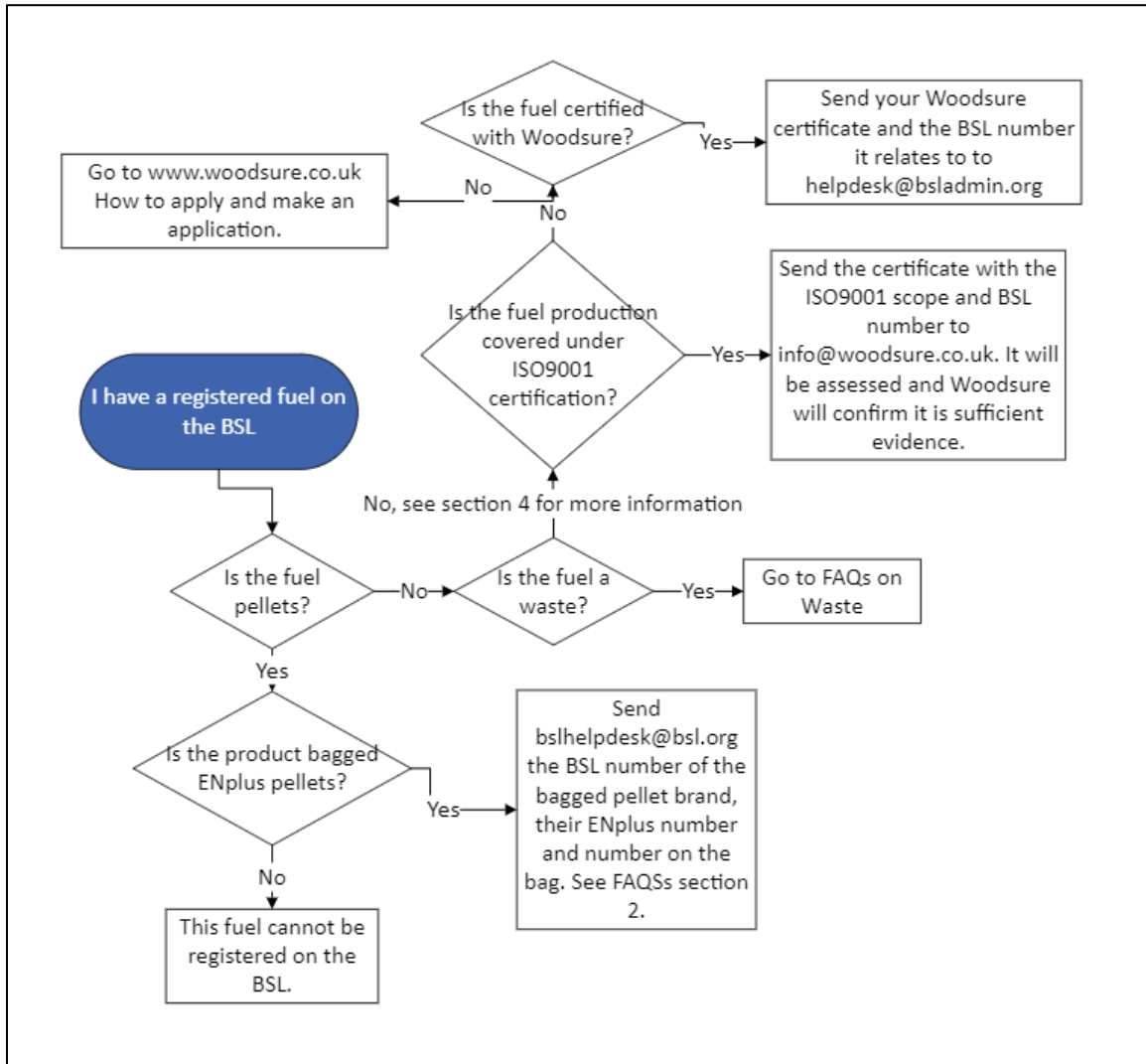
This temporary suspension will be enacted through secondary legislation and will apply to both the non-domestic and domestic RHI schemes. We will work with the Biomass Suppliers List (BSL) administrator to ensure that these pellets can be temporarily accepted on the List subject to compliance with other requirements. We will work with Ofgem to ensure that their compliance regime is adjusted to reflect the changes. We will work with Ofgem to update guidance for participants to be aware of the requirements stated in their emissions certificate when sourcing fuel.

Additionally, we are considering bringing forward secondary legislation to give the Secretary of State the power to temporarily suspend the requirement for domestic and non-domestic RHI participants to use ENplus certified pellets. This power could be used in situations of a shortage of wood pellets in the domestic market, with agreement across government. Our commitments to improve fuel efficiency and air quality remain; therefore, ahead of using such power, we will engage with the biomass industry and consider potential impacts on air quality and fuel efficiency."

Any pellets listed on the BSL without fuel quality associated with it will be removed once the suspension is lifted 23/11/2023.

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Figure 1: Flow diagram of simplified FAQs



1.2 What happens if I and my fuel am not certified by a recognised fuel quality certification scheme?

If your fuel requires fuel quality and you do not join a fuel quality certification scheme your fuel cannot be listed on the BSL.

1.3 If my fuel does require fuel quality, are there any alternative fuel quality schemes I can join?

If you are ISO9001 certified and the fuel production is specified in your scope, the Woodsure³ can assess this as an equivalent scheme. There are no other schemes mentioned in the legislation and any other schemes will have to be assessed by Kiwa⁴, an independent 3rd party appointed by DESNZ. At the date this guidance was released there were no recognised equivalents. See the BSL website for approved equivalents.

1.4 I supply fuel to my own boiler and don't sell the fuel, do I still need to be fuel quality certified?

Yes – depending on your fuel: for pellets see sections 2 and 3, for other fuels see section 4 below for more information.

1.5 I supply fuel to my own boiler, but my RHI payments have ended, do I still need to keep my BSL number?

If your RHI payments have ceased, you are no longer obliged to remain on the BSL, email bslhelpdesk@bsl.org to be removed from the scheme with the BSL number that you wish to remove. This must come from the master user's email address (this cannot be processed on the phone).

³ Woodsure is recognised in Schedule 4a paragraph 4 as the only certification scheme that is able to do this at present. Kiwa can assess equivalents.

⁴ <https://www.kiwa.com/gb/en/services2/certification/beis-equivalent-schemes-for-maintenance-and-fuel-for-the-ndrhi/>

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2. I am ENplus® certified, what do I need to do?

2.1 I supply bulk pellets and am ENplus® certified, what should I do?

Check if the pellet you wish to register on the BSL is ENplus® certified and your BSL depots and the pellets to be onto the bsl are covered by your ENplus® certification. Inform the Certification Body you are registered with of any changes that need to be made, for example additional depots or fuels. The scope of your ENplus® audit will then be adjusted to incorporate the pellets you are selling. Pellets that can demonstrate fuel quality to the BSL at the point of application will be automatically removed once the pellet fuel quality suspension has been lifted.

2.2 I supply bagged pellets and am ENplus® certified, what should I do?

Check that the pellets you wish to register on the BSL are ENplus® certified pellets. If you are unsure whether the bags you are trading are included in your certification, check if they are shown on the ENplus® website <https://ENplus-pellets.eu/en-in> and search for the ENplus® ID for the bags you wish to register on the BSL. Only bag designs approved by ENplus® can be accepted as fuel quality compliant⁵.

⁵ Pellets that can demonstrate fuel quality to the BSL at the point of application will not be automatically removed once the pellet fuel quality suspension has been lifted.

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3. I sell pellets and am not ENplus® certified

3.1 I sell bagged ENplus® pellets?

As long as the bags are sealed and there is the ENplus® ID on the bag and the design is shown on the ENplus® website, then the pellets are covered by the ENplus® certification scheme. You will need to demonstrate to the BSL that you have checked the following:

- A photograph of the bags you have – the BSL administrator will check that the bag design is on the ENplus® website.
- Confirm with the BSL Administrator the ENplus® ID number associated with each of the BSL fuels listed.
- Confirm with the BSL Administrator that you comply with the storage and handling guidelines e.g., ripped or open bags are not sold with a BSL number, bags are not stored outside prior to delivery to the end user, etc.

This is part of your BSL application process. Pellets that can demonstrate fuel quality to the BSL at the point of application will not be automatically removed once the pellet fuel quality suspension has been lifted.

3.2 I bag and sell ENplus® pellets?

Unless you are ENplus® certified, the fuel is not ENplus® certified and the BSL will note that your fuel is not quality certified.

If you wish to apply to get your bagging line ENplus® certified.

Contact: mstafford@pelletcouncil.org.uk to begin the application process.

Your ENplus® certificate will be the evidence required for your BSL application and must include all the pellets that you bag.

3.3 I sell ENplus® pellets in bulk (blown, tipped, etc) from my own store or using my own vehicles. What should I do?

Unless you are an ENplus® certified company, the ENplus® scheme does not cover the pellets that you handle.

Contact mstafford@pelletcouncil.org.uk to apply for ENplus® certification for your fuels to be listed on the BSL from 1st April 2022.

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3.4 I sell ENplus® pellets in bulk (blown, tipped, etc) but I do not handle the pellets myself (known as a paper trader). What should I do?

Any pellets that cannot demonstrate fuel quality to the BSL at the point of application will be automatically removed once the pellet fuel quality suspension has been lifted. Note: any fees will not be refunded when the fuel is removed.

Once suspension of pellet fuel quality has been removed, there are a few different routes available to you:

- If you use a certified ENplus® company to fulfil your deliveries, you should obtain ENplus® sublicence agreement with that company. This sublicence agreement must be submitted by the ENplus® certified company to the UK Pellet Council within 14 days of it being signed for approval. This sublicence contract will be your evidence for BSL and will be verified with the UK Pellet Council. Note: this route is likely to be discontinued once the new ENplus® handbook is released.
- If you cannot obtain a sublicence agreement for your bulk deliveries, you will need to apply to become ENplus to sell the pellets as ENplus.

3.5 I sell non ENplus® certified pellets in bulk. What should I do?

Whilst fuel quality for pellets is suspended⁶, you may apply for a BSL number for those pellets. The BSL will note that your fuel is not quality certified.

Once suspension of pellet fuel quality has been removed, the only pellets that are allowed to be listed on the BSL are ENplus® certified pellets⁷ and your fuel will be removed. Contact: mstafford@pelletcouncil.org.uk to begin the

⁶ Whilst the suspension is in place, pellets will still need to meet the sustainability requirements (land criteria and greenhouse gas criteria)

⁷ Or a recognised equivalent. At the time of publication, there are no equivalents recognised. If this changes, it will be published on the BSL website.



application process. Your ENplus® certificate will be the evidence required for your BSL listed fuels and must include all the pellets that you trade.

3.6 My supplier isn't going to register for fuel quality certification. What should I do?

If your pellet supplier cannot verify fuel quality certification, then their fuel cannot be registered on the BSL. This then includes if you yourself are certified with fuel quality. All suppliers on the chain would require a fuel quality certification.

3.7 My customer isn't on the BSL and Self-Reports direct to the RHI, what do I / they do?

The regulations require that the ENplus® certificate has been verified by Woodsure. Contact them at info@woodsurre.co.uk with your information and ENplus® certificate, and a verification will be issued accordingly to yourselves. This verification must be supplied to your customer, and they should use this when conducting their self-reporting. Verification is currently a free service to ensure that fuels are covered in time in line with the regulations and lifting of the fuel quality suspension for pellets.

How does this affect RHI participants?

Fuel quality remains an important consideration for purchasers of pellet fuels for biomass boilers and plant. As suppliers of fuel we recommend that you ensure that the fuel you are supplying is fit for purpose. Below are some key pointers that you should look at.

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Boiler operation and efficiency

Many smaller boilers in particular, rely heavily on the continued use of a specific grade or type of pellets specified by the boiler manufacturer and/or for effective and efficient operation. There may be manufacturers warranty conditions for boilers under guarantee, where use of a specific fuel type is specified.

Boiler emissions certificate

As part of the RHI and NDRI approval process a specific fuel may have been specified on the boiler emissions certificate to control smoke emissions. Use of other grades of fuel may adversely affect the operation of the appliance and may mean that the emissions requirements in the Regulations are not met. See OFGEM Guidance as they are the Administrators of the financial incentive aspect of RHI.

Larger boilers

It is important to consider any fuel quality issues and warranty provisions etc. Although many larger appliances and plant may tolerate a wider range of pellet grades, it is important to get appropriate specialist advice to be sure that your specific appliance can tolerate any intended grade of fuel.

4. I sell/use fuel other than pellets

4.1 I sell chip/logs/briquette fuels from virgin materials and am Woodsure certified, what should I do?

Check that all your BSL depots and BSL listed fuels are covered by your Woodsure certification (location and quality classification(s)). Inform Woodsure of any changes that need to be made such as adding fuels or depots by emailing registrations@woodsurre.co.uk with the changes required. The scope of your Woodsure audit will then be adjusted to incorporate the other depots/fuels you are selling and/or fuels to be tested. You can then use your Woodsure certificate to demonstrate compliance on the BSL.

4.2 I sell chip/logs/briquette fuels from virgin materials, and I believe I have an equivalent scheme, what should I do?

The legislation allows for equivalent schemes to be recognised. This assessment of equivalence is done via KIWA⁸, the DESNZ approved body. Currently, no equivalent schemes are recognised.

If you have ISO9001, please ensure that the following is included before applying to the BSL.

- Your ISO9001 certification must be in date.
- Your scope of certification must be clear that it covers the quality requirements for the production and supply of the fuel offered, and must cover the depots where your BSL numbers are registered.
- Email this evidence to info@woodsurre.co.uk and Woodsure will acknowledge if your ISO9001 certification is acceptable.

⁸ <https://www.kiwa.com/gb/en/services2/certification/beis-equivalent-schemes-for-maintenance-and-fuel-for-the-ndrhi/>

4.3 I sell chip/logs/briquette fuels from virgin materials, and am not Woodsure certified, what should I do?

If you are not Woodsure certified, go to the Woodsure website <https://woodsurre.co.uk/how-to-apply/> and begin the application process as soon as possible. If you are not certified your fuels cannot be listed on the BSL.

4.4 I sell chip/logs/briquette fuels from waste or waste blend materials. What should I do?

Refer to the [Waste Wood Guidelines](#) on the BSL website.

You will need to inform the BSL Administrator that you have the correct permits or exemptions in place and send their respective reference numbers to bslhelpdesk@bsl.org from your master user email address, identifying which BSL number(s) this relates to.

If you are unsure if your fuel is defined as waste in the eyes of the RHI, please see this document here: <https://www.ofgem.gov.uk/publications/renewables-obligation-fuel-classification-flow-diagram>



Version Control

Issue No.	Amendment Details	Date
1.0	Final Version Published	08.02.2022
1.1	Early April update on how the information can be sent, flow diagram and suspension questions	11.04.2022
1.2	Update following pellet fuel quality suspension	23.11.2022
1.3	Replaced reference to BEIS with DESNZ	23.06.2023
1.4	Added further FAQs regarding ENplus process ahead of pellet suspension lifting, amended information regarding pellet suspension to outline that it is lifting	17.11.2023
1.5	Changed the Figure 1 flow diagram to accurately show current process.	29.11.2023