

Non-Domestic Renewable Heat Incentive (RHI)

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Non-Domestic



Sustainability - Frequently Asked Questions

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1. What are the new requirements?

If you generate heat (or heat and power) from biomass or biogas and are claiming the Non-Domestic Renewable Heat Incentive (RHI), from 5 October 2015 the fuel used in your installation must meet the new sustainability requirements. These requirements include a greenhouse gas (GHG) emissions limit and land criteria, and it is important that you comply with these from 5 October 2015 as failure to comply may affect your payments. The requirements differ if your fuel can be classed as a residue or waste.

2. What do I need to do?

The simplest way for most participants to meet the requirements is to use the [Biomass Suppliers List](#) (BSL). Suppliers can register themselves as sellers of fuels that do not exceed the GHG limit and meet the land criteria. This enables you to find a suitable supplier and fuel, giving you assurance that your fuel complies with the RHI sustainability requirements. Alternatively, if you source your own fuel, you may be able to register as a self-supplier to demonstrate you comply with the sustainability requirements. The BSL is open to all traders, producers and self-suppliers of biomass which is wood or wholly derived from wood, including waste wood. This option is not permitted for biogas and CHP installations, or biomethane producers, who will have to self-report against the requirements. See the [Sustainability Self-reporting Guidance](#) for more information.

3. What will I need to submit after 5 October 2015?

You will need to show how you have complied with the sustainability requirements by submitting sustainability information to us quarterly along with your meter readings:

- If you have purchased from or are registered on the BSL we will ask you for a BSL authorisation number(s).
- If you are self-reporting we will ask you to declare whether each consignment you used was waste, and if not, whether it met the GHG and land criteria, and what the GHG emissions figure was.
- If you are biomass CHP of 1MWe or above and accredited on the Renewables Obligation (RO) we will ask whether you have been meeting the RO sustainability requirements.

Biomass Suppliers List

4. How do I obtain an authorised fuel?

You can search [the BSL website](#) for suppliers by name or by those closest to your postcode to find an authorised fuel or check whether your existing supplier is registered. If they are you should still contact them to ensure the specific fuel you buy is authorised.

5. I buy authorised fuel from a supplier on the BSL - what do I do now?

You need to keep a record of your invoices/receipts and ensure each of these documents contains a BSL authorisation number to demonstrate your compliance with the sustainability requirements. The BSL authorisation number will have the format **BSLXXXXXXXX-XXXX** where each X is a number. From 5 October 2015, you will need to report the authorisation number(s) for the fuel(s) you have used in each quarter along with your meter readings.

6. Can I buy BSL approved fuel from a supplier that is *not* registered on the BSL?

The approval of a fuel on the BSL is associated to the supplier who registered that fuel. Only that supplier is permitted to provide that authorisation number to their customers. If someone buys that fuel from the supplier and then sells it to another customer, they shouldn't be using that BSL authorisation number for the fuel. This is because the emissions associated with the new supplier's management of the fuel, and their associated processes have not been assessed and approved. Either this supplier would need to register and get their own authorisation number or you need to 'self-report' against the sustainability requirements, however this is more onerous than using the BSL route. Refer to [the BSL administrator](#) for further information.

7. What happens if the supplier I'm buying BSL authorised fuel from is taken off the BSL?

If you purchased a BSL-approved fuel that later had its status revoked, then you can continue using it as long as the fuel was listed on the BSL at the time you received it. Customers will not be disadvantaged if their supplier loses BSL authorisation after fuel has been received. However, you would then need to find [a different supplier](#) for your next delivery of fuel.

8. Am I already using an approved fuel?

The best way to check if you are already using an approved fuel is to call your supplier and ask. You can also check your most recent fuel receipt and look for an 'authorisation number'. This will have the format **BSLXXXXXXXX-XXXX** where each X is a number. For more information about using the BSL route of compliance, see chapter 4, of the [Guidance Volume 2](#).

9. I want to source my own fuel (become a self-supplier) - what do I do?

If you want to use fuel you have sourced yourself (rather than purchased), you may be eligible to register on the BSL as a self-supplier. This is as long as:

- a) your installation capacity is under 1MWth; **and**
you source solid biomass from a permitted location – which means somewhere you have a right to harvest the solid biomass, whether by virtue of ownership, tenancy or otherwise; and is no more than 50 miles from the plant where it is used; **or**

- b) you source waste wood as fuel directly from the place where it first became waste to use in your installation (no distance limit).

If (a) or (b) apply to you, you will need to register on [the BSL as a self-supplier](#). If you are also buying in raw materials you may need to register as a 'producer-trader'. See the factsheet on the [BSL website](#) for further information on being a self-supplier or producer-trader.

10. What do I do with my stockpile of wood which I produced myself (self-supplied)?

Once you have registered on the BSL as a self-supplier, we would consider that you are using sustainable fuel from the date of that registration. This includes the use of any fuel that was harvested or stored before registration began, and used after 5 October 2015.

11. I'm on the BSL as a self-supplier (or a producer/trader) - what should I do now?

All you need to do is keep a note of your BSL authorisation number (which will be assigned to you once registered on the list) and keep a record of the fuel(s) you use. See our guidance on fuel records [here](#). From 5 October 2015, we will ask you to report the BSL authorisation number in each of your quarterly periodic data submissions, along with your meter readings.

12. I'm on the BSL as a trader (or producer/trader) - what should I do now?

You may wish to inform your customers that you are registered on the BSL. You also need to include the BSL authorisation number clearly on receipts and invoices provided to them. If you are registered on the BSL and have chosen to be publicly listed, customers can search for you on the [BSL website](#).

13. What does 'approved list' mean? I have Forest Stewardship Council (FSC) certification - does that count?

An approved list is a scheme that has been approved by the Secretary of State as meeting the RHI Regulations. Approved lists enable participants to demonstrate that they have complied with the RHI sustainability requirements by using a fuel authorised on that list. The [Biomass Suppliers List](#) is an approved list. At the time of writing, there is no other approved list.

FSC certification is not considered an approved list. It gives us assurance that the land criteria requirements have been met for woody fuels, if sufficient evidence of this certification can be provided. However, participants must still calculate the greenhouse gas (GHG) emissions for each consignment to demonstrate that they meet the GHG criteria, through the 'self-reporting' route.

14. Are the new sustainability requirements the same as ENPlus A1 standard?

No. The BSL is a list of biomass suppliers, and covers types of woody fuels; pellets, briquettes, wood chips and firewood (logs). Unlike ENPlus A1, the BSL is not a mark of wood pellet quality. However, if you want to use a fuel which also meets a particular quality standard, the BSL '[find a fuel](#)' tool allows you to search for fuels in your area which meet either of the two-widely used quality standards: ENPlus and Woodsure.

Self-Reporting

15. What is self-reporting and how do I do it?

Those who don't source from the BSL, register as a self-supplier (or producer/trader) on the BSL must self-report on the sustainability requirements for the fuels they use. Those with a biogas installation and biomethane producers, and those who do not meet the RO sustainability requirements (as a biomass CHP of 1MWe or above) must self-report.

From 5 October 2015, you will have to declare whether the fuel you have used is waste, and if not, whether each consignment meets the land and GHG criteria and provide a GHG emissions figure per consignment used. This will be requested in each of your quarterly submissions alongside your meter readings. Further information for self-reporting is available in the [Sustainability Self-reporting Guidance](#).

16. How do I measure my fuel for self-reporting?

You will need to complete and submit a Fuel Measurement and Sampling (FMS) questionnaire at the application stage so that the classification of consignments can be reviewed by Ofgem. If consignments are mixed, applicants and participants will need to describe what they will do to account for the amount of each consignment used per quarter. This will need to be reviewed and agreed with Ofgem before an application can be accredited/registered. See the [FMS Guidance](#) for further details.

It's your responsibility to gather suitable evidence to demonstrate compliance with the RHI sustainability requirements. Some of the evidence may lie with other parties in the supply chain (evidence for meeting land criteria). While the physical evidence does not need to move through the supply chain with the biomass, you should have enough information to have confidence in reporting sustainability information to Ofgem. You may have to rely on contractual agreements.

All existing participants intending to self-report need to complete a Fuel Measurement and Sampling (FMS) questionnaire and upload it to the RHI Register. See the [FMS questionnaire and guidance](#).

17. Will I need to do separate calculations on my GHG emissions, and validate land criteria for the purpose of the annual sustainability audit report?

No. The annual sustainability audit report should be an evaluation of your declarations each quarter and the collated evidence that supports this. The criteria must be met each quarter to be considered sustainable. GHG emissions per consignment cannot be averaged over the year. Note only biomass and biogas self-reporters with an installation of 1MWth or above, and biomethane producers must submit an annual sustainability audit report.

18. I produce biomethane, what do I do?

If you are producing biomethane for injection, see the [Sustainability Self-Reporting Guidance](#). Self-reporting and annual audit reports are mandatory for biomethane producers.

Fuel Classification

19. What is the definition of waste?

The RHI Regulations define waste as: “waste” has the meaning given in Article 3(1) of Directive 2008/98/EC of the European Parliament and of the Council on waste and includes excreta produced by animals.” Directive 2008/98/EC is also known as the Waste Framework Directive.

20. I’m unsure of my fuel classification. Can you help?

If you are unsure of your fuel classification, read and check the table in Appendix 2 of the [Sustainability Self-Reporting Guidance](#). If your fuel is not listed in Appendix 2, then you will need to describe your fuel and the process by which it was produced as part of your [FMS questionnaire](#), with your proposed classification and we will review this.

If you were already a participant on the RHI scheme before the 5 October and will be self-reporting, fill in the above as soon as you can and upload it to the RHI Register.

21. I use straw, what do I do?

As you are using a non-woody biomass you need to self-report to demonstrate compliance with the sustainability requirements.

You will need to demonstrate that the land criteria have been met, and to calculate GHG emissions from the point of collection of the straw. This is referred to as the ‘actual value method’. See the [Sustainability Self-Reporting Guidance](#) for further details of this.

However, there is a simpler route available. In Appendix 3 of the [Sustainability Self-Reporting Guidance](#) ‘Wheat straw’ has a ‘default value’ provided for GHG emissions. If you think that this matches your fuel type then you may use this ‘default value method’, rather than carrying out your own emissions calculations. This is as long as the capacity of your

installation is below 1MWth and you are not using heat for 'process heating'. For further details of both methods, see Chapter 5 of the [Sustainability Self-Reporting Guidance](#).

22. I burn miscanthus, what do I do?

Miscanthus is classed as non-woody biomass and so cannot be registered on the BSL, so you will need to self-report. This means that you will need to demonstrate the fuel you use each quarter meets the land criteria and greenhouse gas (GHG) emissions limit. Land criteria will automatically be met where financial assistance has been paid under the Energy Crops Scheme, or under an equivalent financial assistance scheme. If not, you will need to demonstrate that the miscanthus was not obtained from a 'protected source'. GHG emissions must be calculated by the participant. Guidance on calculating GHG emissions and meeting land criteria can be found in the [Sustainability Self-Reporting Guidance](#).

'Miscanthus bales' are in the list of default values in Appendix 3 of the Sustainability Self-Reporting Guidance. If this matches your fuel type you may be able to use the 'default value method' which is explained in chapter 5.

23. Why is my fuel not listed in the default values table? What do I do?

The fuels with default values are in the RHI Regulations which the Department of Energy and Climate Change (DECC) is responsible for. This gives a list of default emissions values which you can use if your fuel matches the description of one of those listed. However, the carbon calculator lists 'typical values' of the emissions associated with different parts of the fuel production process. A step-by-step guide for using the carbon calculator is available on the [Ofgem website](#), which can be used where appropriate.

24. I will be self-reporting. How do I calculate my GHG emissions?

You can use the UK Biomass and Biogas Carbon Calculator to calculate your GHG emissions, which can be found on the Ofgem website along with guidance on how to use it here. The calculator is managed by E4Tech, queries related to the technical aspects of the calculator should be addressed to them.

Other IT-based tools are available which a participant can use when calculating the GHG emissions for their fuel chain. Alternatively, participants could create their own tool. If a participant wishes to use a tool other than the UK Carbon Calculator, the onus is on them to ensure – and be able to demonstrate to Ofgem – that it meets the methodology as set out in the RHI Regulations and that any in-built standard input data is appropriate.