



BSL Advisory Panel – Decisions and Actions

Meeting 07

Time and date	11:00 – 15:00, Wednesday 18 th July 2018
Venue	BSW Timber, Carlisle Sawmills, Carlisle CA6 4BA
Date of issue	01/08/2018

1. Welcome and housekeeping, & Objectives

The Chair welcomed attendees and invited the newly elected Panel members to introduce themselves.

The Chair then ran through the proposed objectives for the meeting.

- i. **Recap** on what was covered in the last meeting
- ii. **Introduce** new Panel members that have been successfully voted in
- iii. **Discuss and agree priorities** for issues previously identified and determine actions to be taken forward
- iv. **Provide updates** on the BSL service including general service review, numbers, issues & progress
- v. Discuss options on quality and waste wood and **AGREE** next steps
- vi. **Discuss options** on educating and enforcement on the BSL and **AGREE** next steps
- vii. Panel to **input** regarding adding new fuels on the BSL

MS joined at 11:15am.

2. Panel Elections

The BSL Administrator ran through the Panel elections that had recently carried out, highlighting that the process commenced in June and that 17 nominations were received for the vacant positions. Further to this, a review was carried out on the nominations received, and 14 candidates



were then put forward for vote. A total of 40 votes were received. The new Panel members were added to the BSL Advisory Panel list. It was also recognised that Amanda Calvert should be representing Small Woodland Association and not Woodsure.

3. Review of minutes and actions from Panel 06

No comments were received on the draft meeting summary of Panel 06. The summary was agreed to be an accurate representation of the meeting and were finalised.

The BSL Administrator ran through the open actions from previous meetings and provided updates and outcomes for each set out below:

Action Ref	Action	Updates	Further Updates
04-02	BSL Administrator to recirculate the recorded Huddle webinar.	Huddle have updated their website, so the original webinar is now redundant. Waiting for Huddle to release a new guide/webinar opportunity. From July 2018 Huddle is no longer a free service. It will cost the scheme - £2,304/ year. ~£8/user/month. Huddle is a secure way of sharing information and is a contractual requirement to continue using Huddle for data sharing and audits. Panel are to discuss and recommend whether we continue using Huddle for meeting purposes. Status: Closed	The BSL Administrator took a new action to consider and review Dropbox as an alternative to Huddle for sharing information with Panel.
04-12	BSL Administrator to work with HBF to develop guidance for helpdesk regarding the waste wood guidance requirements. BSL Administrator to share this text with Ofgem.	Remain open until an agreement is reached.	Status: Remain open
05-06	JMJ and FA to consider what kind of data would be useful for industry and why	Emissions statistics have been extracted from the BSL Portal and were presented to Panel under agenda item 4 at Panel meeting 06 (18/04/18).	Status: Re-open

	such as to determine fuel efficiencies, GHG savings, usage of fuels, drying, processing.		
05-08	AF to produce an BSL waste wood options paper that BEIS directors can consider. Financial and political decisions need to be made from this.	AF produced an options paper which has been circulated to relevant parties for comment. BSL Administrator requested an update on next steps.	This was discussed under agenda item 6. Air quality and Waste Wood. Status: Remain open
05-09	HBF to provide a revised form of wording for the Wood Fuel Advice Notes and submit this to BEIS. HBF to circulate the amendments via Huddle/email.	Discussed during the meeting.	HBF to share suggested updates with the BSL Administrator to circulate to the Panel for comment. Status: Remain open
06-01	BSL Administrator to carry out a Panel Election for fill the following roles: <ul style="list-style-type: none"> • Self-Suppliers and Producers • Fuel Type – Briquettes • Fuel Type – Pellets • Raw Materials – Forestry • Fuel Type – Logs • Arboriculture • Small Woodland Owners 	6 Panel members have been selected to represent the vacant roles. Discussed under agenda item 2. A public announcement will be made on 24/07/18.	Status: Closed
06-02	BSL Administrator to rationalise the priority list and add descriptions against each item. Once this is done, a re-vote can be done.	Discussed under agenda item 5.	List has been rationalised. Panel to vote before the next BSL Panel meeting in October. Status: Remain Open

<p>06-03</p>	<p>BSL Administrator to provide a breakdown of costs incurred and % income stemming from application, membership and tonnage fees.</p>	<p>This is incorporated as part of the BSL Administrator update under agenda item 5.</p>	<p>Status: Closed</p>
<p>06-04</p>	<p>BSL Administrator to see what further information can be extracted from the application process regarding origins of wood fuel.</p>	<p>Further details that can be extracted from the Portal are:</p> <ul style="list-style-type: none"> • Country • Raw materials • Distance from source to processing site • Transportation type <p>This is incorporated as part of the BSL Administrator update under agenda item 5. It excludes data from waste and B2C2s. This would be a manual process to go in to each application to extract the specific details.</p>	<p>Status: Closed</p>
<p>06-05</p>	<p>BSL Administrator to see if Self-Suppliers can use waste wood and establish what proportion are using waste wood. Provide the exact definition of a Self-Supplier and what they are permitted to do.</p>	<p>Here is the Self-Supplier Fact sheet that includes waste wood definition and evidence. Self-Suppliers can submit waste wood application if:</p> <ul style="list-style-type: none"> • The waste wood is sourced legally and in compliance with regulations for burning waste wood as a fuel set out by the appropriate authority. • The supplier is not selling their fuel • The capacity of their boiler is less than 1,000 kW <p>Self-suppliers can source waste woodfuel from outside their Estate for use in their installation. They must have a permit/exemption for processing, storing and burning the waste wood from the relevant environmental authority. When submitting a waste wood application, the supplier enters the annual quantity of waste wood sourced and attach their waste permit/exemption. When audited, the supplier must provide:</p> <ul style="list-style-type: none"> • A waste report that clearly details the quantity of the waste fuel produced; and 	<p>Status: Closed</p>

		<ul style="list-style-type: none"> • Locations and details from where the waste wood is sourced; • Evidence that the waste can be burnt in a boiler. 	
06-06	JMJ to provide an update to Panel on the waste wood discussions with Therese Coffey.	Update provided at the meeting.	JMJ explained that it is an on-going issue, but the action can be closed. Status: Closed
06-07	BSL Administrator to provide a breakdown of complaints related to quality.	Included as part of the BSL Administrator update.	Status: Closed
06-08	The Chair, ML and AH to discuss ideas around education and what can be done that is cost effective yet satisfies the target audience.	Update provided at the meeting.	This is incorporated under agenda item 8. Status: Closed
06-09	BSL Administrators to add an additional column to the communication plan to show the targeted audience.	This has been incorporated in to the BSL communications tracker.	Status: Closed
06-10	BSL Administrators to communicate to the market that audits are being undertaken/initiated and that non-compliance results in penalties.	A newsletter was drafted for Ofgem on 21/05/18.	A communication was sent out in Ofgem's RHI latest newsletter and BSL Administrators will circulate a specific one to their suppliers. Status: Remain Open
06-11	AH to lead on an audit and enforcement strategy that can be used to communicate to the industry.	Update provided at the next meeting.	This is covered under agenda item 7. Status: Closed

06-12	BSL to think of ideas to help consumers and suppliers have a specific path for information and education on the website.	Included as part of the BSL Administrator update.	Included as an appendix but did not get looked at due to time constraints. Sub group formed, and this will be reviewed as a part of that. Status: Remain Open
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Action Panel 07-01	BSL Administrator to consider and review Dropbox as an alternative to Huddle for sharing information with Panel.
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4. Ofgem update

LB updated the group regarding a cross-scheme data and information sharing set up with Ofgem/RHI, the BSL and MCS to improve communication across the supply chain. LB thanked Gemserv for referrals of instances of non-compliance observed by the BSL outside of their remit but covered under the RHI.

The Panel were informed that there will be an upcoming RHI newsletter at the end of the month and this will highlight other requirements outside of the RHI that may affect their payment e.g. emissions certificates. LB also stated that Ofgem are on a cross Government panel with BEIS.

RHI operations are revamping their Fuel Measurement and Sampling Questionnaire (FMSQ) to aid people applying to the RHI. The Chair queried the updates being made and whether they are necessary. LB explained that the revisions are an attempt to streamline the process, reducing the need for the operations team to go back to applicants for more information.

RC queried whether the cross-party group will come up with a clear statement in relation to waste wood and Non-WID boilers. JL confirmed that this sits under DEFRA's remit, but the EA will enforce it – this includes the rules on emission levels for medium sized plants.

5. BSL Administrator update

The BSL Administrators presented the administrator update. The Chair questioned the Panel regarding finances and what would happen if the scheme over-collects. BP stated that the reason



for the surplus was two quarters of operating at significant deficit, and two quarters of significant income. It was agreed to not use the scheme surplus immediately, but to monitor the situation and report at the next Panel meeting. The Chair added that the group shouldn't have to rely on fees to make scheme improvements.

MA added that an improved level of service is crucial during peak periods, especially as the previous winter was very challenging. A question was also raised regarding the number of staff reviewing applications. IJ stated that there are currently 2.5 members of staff reviewing applications, with other members trained on the contract to provide support during peak periods. It was also added that this time and cost doesn't include any scheme management, independent audits, IT hosting, meeting requirements or contractual reporting etc.

IJ added that Pellet applications were a priority during winter, however delays occur in the process as a result of (among others) providing incorrect evidence, errors in the application or Suppliers not reading the guidance.

BP stated that there should be different turnaround times for Trader and Producer applications as Producers are more complex. The BSL Administrator explained that the average review time is 19 working days, and that all applications are within the agreed contract KPIs, but that the KPIs can be reviewed.

The Chair asked JL to see where the Panel can influence the contract's KPIs and SLA's. JL explained that as Gemserv won a competitive tender they wouldn't be able to share all details, but the Panel could provide input on the KPIs.

Action Panel 07-02	BSL Administrator to breakdown the approval time for the different Supplier types.
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MA noted that each business approaches the application process differently and volunteered to help support any improvements. KR added that there is little information if you are a Self-Supplier with multiple sites. ML added that the process time could be reduced if guidance was improved and education was provided around the process.

Action Panel 07-03	BSL Administrator to revise "Application & Audit" guidance document to ensure Suppliers follow the necessary steps in successfully submitting an application with the relevant evidence.
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Action Panel 07-04	MA to work alongside BSL Administrator to illustrate application issues.
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The BSL Administrator highlighted there was a spike in May 2018 removals due to communications sent out to Suppliers detailing outstanding payments. Half of the remaining 42% that were complete applications, were removed due non-compliances as a result of an audit.

Action Panel 07-05	BSL Administrator to provide a further breakdown of removals.
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The Panel then reviewed the quarterly reporting figures for 2017/2018. It was requested that it was made clear that the results are reported in tonnes and with a 10% moisture content.

Action Panel 07-06	BSL Administrator to show the quarterly reporting (QR) figures are in tonnes and with a 10% moisture content.
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It was agreed that clarity was required surrounding the data extracted from the portal and how this can be made publicly available. As such, it was agreed that a subgroup should be created to look at the data in more detail. The BSL Administrator presented information on the origin of wood fuel listed on the scheme. It was explained that this was not based on tonnage, but as a weighted percent of applications that have declared where the fuel originated from. The Chair suggested this be added to the subgroup agenda.

Action Panel 07-07	BSL Administrator to create a subgroup (including MA, FA, BP, JMJ, IT and HBF) to better understand the data and how this can benefit industry.
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The Panel then reviewed the redrafted Panel priority list. The Chair decided that the new list would be looked at offline and requested that Panel provide comments so that a vote can be made before the next meeting.

The BSL Administrator ran through the breakdown of complaints related to quality. BP added that he would like funds to go towards improving quality.

Due to time constraints, the Panel didn't review the website mock up pages, but FA stated that it looked very useful and feels that this could be the basis of a new BSL website. It was agreed to look at this as part of the subgroup.

6. Air quality and waste wood

JL led the discussion on air quality and waste wood. She noted that the RHI has undergone an audit from National Audit Office and received recommendations. BEIS are currently looking at the impact of the RHI on air quality. It was explained that different workstreams have been set up to tackle key issues:

1. Evidence
2. Enforcement
3. Regulatory changes
4. Waste wood
5. Product Standards

The first step would be to gather and review the evidence at hand and to identify the genuine impact the RHI poses to air quality. The enforcement is led by Ofgem and DEFRA to better understand how they can work together for data sharing purposes. It was also explained that a specific regulatory change will be made to address the issues. This is currently being considered as part of DEFRA's air quality strategy consultation that is out now. It was added that there is a commitment from BEIS to consult on removing biomass boilers in urban areas. Finally, the Environment Agency are working alongside the WRA to try to categorise the different types of waste to better enable them to judge how appropriate fuels are to burn. The product standards group will be looking at in-situ emission certificates. The workstreams aim to report findings with potential options to a head committee in September. JL added that the groups can carry out further studies where additional information is required.

BP suggested that EN 303-5 is reviewed and tests defined.

RC added that the WRA are reclassifying clean and treated, hazardous and non-hazardous and that the Medium Combustion Directive will support this. JL noted that regulation changes take a long time to update and it is much quicker to update guidance. A question was raised as to how will BEIS police the changes, JL clarified that this will be addressed in the enforcement workstream. The work the WRA is doing in conjunction with the EA regarding waste wood classification will help inform the cross-party group.



Additionally, there will be a committee meeting in September to discuss this further as well as the next Panel Meeting.

7. Audit and enforcement

AH presented his strategy document to the Panel, noting that only a small percent of Suppliers are audited on the scheme, which is why the focus is on high risk Suppliers. Non-compliances can be avoided if the guidance is properly read and understood. AC commented that there is a lack of understanding from Self-Suppliers regarding their understanding around the application process and the requirements, so often have minor non-conformities.

KR stated that there is a link between installers and the handover of information. Installers aren't providing the useful and relevant information to the consumer which ultimately leads to a lack of knowledge. These errors need to be targeted before audits are carried out.

Panel discussed what constitutes high risk and the typical types of fuel they burn. It was mentioned that commercial Suppliers are checked against where the fuel is coming from, distance travelled, volumes reported etc.

Panel also discussed whether other audits should be carried out other than on a risk-based approach. HBF suggested to continue using the risk-based approach for half the audits, then a random selection for the other half. MA added that communications could focus attention. The Panel agreed that it would be useful to understand the findings from the audits and to monitor the non-compliances over the year to see what patterns emerge. JL highlighted that it is important to differentiate non-compliances and fuels that are not sustainable, and how this could affect the schemes credibility. The overall consensus of the report is that although there is adequate guidance available, not all suppliers follow this and the suggestion from Panel was that efforts to raise compliant Supplier activity, is through better knowledge or education as opposed to an increase in audits.

Action 07-08	The BSL Administrators present audit and non-compliance findings to Panel.
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8. Education

The Chair suggested to postpone the education item to the next Panel meeting due to time constraints. ML stated that communication is pivotal as BSL Administrators are receiving complaints that is beyond their remit. One might argue that there isn't a major issue at hand, but it highlights that the whole industry needs better agency coordination in term of communications.

BEIS would welcome any recommendations on what needs to be communicated and the proper way of doing so in the biomass market. ML followed this by stating both internal and external communication is required.

MS suggested a BSL newsletter stating what Suppliers should be doing and use this for industry updates.

9. Supplier terms and conditions

This item was proposed to take offline and discuss further with BEIS.

10. Torrefied wood pellets

BP stated that one of the UK Pellet Council members raised an issue regarding a modest quantity of virgin wood fibre pellets in Cornwall – the advances they're testing is torrefaction. This process alters the characteristic values in causing hydrophobic and higher calorific valued pellet. They had applied to the BSL but told it was not a fuel that the portal accommodates and therefore have gone to the Sustainable Fuels Register (SFR). BP also stated that the boiler emission certificate is now available for torrefied pellets and therefore can be accepted on the RHI. It was agreed that the BSL Administrator should take an action to see what changes are required to the portal to incorporate this fuel. It was suggested that two options should be produced, including time and cost for a "quick fix" – a new fuel type and a B2C2 carbon calculator and then an imbedded option.

Action Panel 07-09	BSL Administrator to draft a proposal with two options: one 'quick' fix and one longer term portal change for adding a new fuel to the scheme.
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11. AOB

The Chair questioned the Panel to see if they would like to have an EA representative as a member of the BSL Advisory Panel – the Panel were in favour of the idea.

BP requested to be able to see information of manufacturers and carbon emissions for BSL fuels on the “Find a Fuel” section of the BSL website. BP argued that this information is collected, and it could be downloadable in a CSV file to show each BSL fuel, where it was manufactured and what the carbon footprint is.

The Chair decided this was too complex of an AOB and requested that BP to type up his thoughts and this would be discussed at the Panel subgroup focusing on data.

Provisional Panel meeting dates:

- 17 October 2018

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Appendix – List of meeting attendees

Members

Member name	Organisation	Attending
Julian Morgan-Jones (Chair)	SEWF	Yes
Duncan MacKinnon	Tilhill Forestry	Yes
Bruno Prior	Forever Fuels	Yes
Mark Lebus	LC Energy	Via teleconference
Peter Townson	A W Jenkinson	Yes
Malcolm Snowie	Scot Heating Company	Yes
Andrew Hopton	HETAS	Yes
Frank Aaskov	REA	Via teleconference
Ian Tubby	FC England	Yes
Richard Coulson	RWE	Yes
Kirsty Rice	National Trust	Yes
Luke Bailey	Ofgem	Via teleconference
Helen Bentley-Fox	Woodsure	Yes
Imogen Jamie	Gemserv (BSL)	Yes
Neeraj Vasani	Gemserv (BSL)	Yes
James Little	Arensis	Via teleconference
Tim Mack	Elderslie Estate	Yes
Ross Lowrie	Self-Supplier	Yes
Paul Gibbon	Mistral Energy	Via teleconference
Mark Appleton	Forest Fuels Ltd	Yes
Amanda Calvert	Small Woodland Association	Yes
Andrew Heald	Confor	Yes

Non-member attendees

Name	Organisation	Position(s) represented	Attendance
Jane Lumb	BEIS	BEIS	Yes
Imogen Jamie	Gemserv	BSL Administrator	Yes
Neeraj Vasani	Gemserv	BSL Administrator	Yes
Andrew Hopton	HETAS	BSL Administrator	Yes
Helen Bentley-Fox	Woodsure	BSL Administrator	Yes
Luke Bailey	Ofgem	Ofgem	Via teleconference

Apologies

Name	Organisation
Jason Hubert	Forestry Commission Scotland
Julia Turner	WRA
Ema Arvati	BEIS

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