



BSL Advisory Panel – Decisions and Actions

Meeting 10

Time and date	11:00 – 15:00, Wednesday 17 th April 2019 (lunch provided)
Venue	Gemserv, 8 Fenchurch Place, London. EC3M 4AJ
Date of Issue	01/05/2019

1) Welcome & Housekeeping

The Chair welcomed the Panel members and those who joined via teleconference (JT, AC & DM).

The BSL Administrator ran through Huddle to show where documents are saved, explaining that the number of slides have been reduced and all supporting data can be found on Huddle under “Supporting Documents”. It was added that we will continue to use this for any large data sets. The Chair invited dial-in participants to contact the BSL after the meeting if they need any assistance. The Chair reiterated the point on removing the large data sets from the slide to save time during the meeting and for the BSL Administrator to highlight any significant changes going forward.

The Chair ran through the agenda and asked if anyone has any comments. AM apologised for the email he had sent to the BSL Administrator previously as the information had been misinterpreted.

The Chair went through the objectives of the meeting.

2) Review of minutes and actions from Panel 09

The Chair asked if anyone had any issues with the minutes from the last meeting. The minutes were accepted as an accurate reflection from the last meeting and ran through the open actions:

Ref	Action	Owner	Status	Updates
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	BSL and HBF	Ongoing	Remain open until agreement reached. Update: NC had a discussion with JT regarding waste definitions and where we should be heading. Adding that BEIS are keen to progress some of the early work that Panel had done and an update will be provided in a few weeks,
05-06	JMJ and FA to consider what kind of data would be useful for industry and why such as to determine fuel efficiencies, GHG savings, usage of fuels, drying, processing.	JMJ FA	Ongoing	Re-opened at the previous meeting. Update: The Chair suggested closing this and including it into the data subgroup.
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.	BEIS	Ongoing	Remain open until agreement reached. Update: It was agreed to combine to 04-12.



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.	HBF	Ongoing	Remain open until the work with the EA on waste wood classification has been completed and an Air Quality Group involving BEIS, the EA, NRW and SEPA have fed back on their views on the use of waste wood. Update: It was agreed to combine with 04-12.
06-10	BSL Administrators to communicate to the market that audits are being undertaken/initiated and that non-compliance results in penalties.	BSL	Propose to Close	A communication was sent out in Ofgem's RHI latest newsletter and BSL Administrators has circulated a specific one to their suppliers. Update: All agreed to close the action.
06-12	BSL to think of ideas to help consumers and suppliers have a specific path for information and education on the website.	All	Ongoing	BSL mock up website was circulated to all member. Content and layout are to be reviewed and agreed. Update: The website prototype can be found in Supporting Documents on huddle. It was agreed to close the action and for it to be discussed as part of the Communications subgroup.
07-04	MA to work alongside BSL Administrator to illustrate application issues.	MA	Propose to close	BSL have created application user guides and approval time has reduced by 50% from Feb 18 – Feb 19. Update: Covered in agenda item 5. Agreed to close.
09-01	BSL Administrator to create and send a new priority item list and add an option of 'other' for Panel members to suggest new items.	BSL	Propose to close	BSL circulated new survey alongside draft agenda on 03/04/19 – 1 response received (10/04/19). Update: Covered in agenda item 3. Agreed to close.
09-02	BSL Administrator to ask for feedback from Panel on the existing mock up BSL website.	BSL	Propose to close	BSL recirculated with Final agenda. Also saved in 'Supporting Documents'. Update: Agreed to close.
09-03	BSL Administrator to explore a breakdown of membership fee income in different supplier categories	BSL	Propose to close	BSL provide an update as part of the Administrator update. Update: Covered in agenda item 5. Agreed to close.
09-04	BSL Administrator to investigate the possibility of obtaining data from self-suppliers and other data that the BSL does not currently hold.	BSL	Propose to close	Update provided as part of Ofgem update. Update: Covered in agenda item 4. Agreed to close.
09-05	BSL Administrator to include new quarterly reporting split at the next meeting and to remove stats from update slides but to include in them separate paper for reference. Going forward Administrator to only provide information on significant changes in stats during the meeting update.	BSL	Propose to close	New folder created for 'Supporting Documents'. Update: Covered in agenda item 5. Agreed to close.

09-06	BSL Administrator and Chair to identify sub-areas for discussion and ask for representatives.	BSL	Propose to close	To be discussed under item 4. Update: Covered in agenda item 4. Agreed to close.
09-07	HBF, AC, DM and Ofgem to contribute to creating a definitions list to present to Panel at the next meeting.	BSL	Propose to close	Completed on 10/02/19. NV circulated on 13/03/19. To be discussed under item 4. Update: Covered under agenda item 4. Agreed to close.
09-08	Panel members who can offer locations for Panel meetings to contact BSL Administrator.	BSL	Propose to close	AC offered Greenwood centre at the last Panel meeting (16/01/2019) but was changed to London as members booked travel to London. Update: AC said the offer still stands for the next meeting. Next meeting is 17/07/2019. AM also offered to see his company site on that day. AC has booked a meeting room in Telford for the July meeting. It was agreed that unless otherwise stated the Chair will assume the meetings will be held in London (Gemserv). Agreed to close.

3) Priority items list

The Chair mentioned that there had been an element of struggle to get Panel to vote on the priority items which establishes what the most important topics are, to set future agendas. The Chair confirmed there have been 10 responses. The BSL Administrators also provided smart tablets in the meeting in which the survey can be completed and general feedback could be submitted.

The BSL Administrator ran through the results to see what Panel felt were the most important for the group to focus on.

[BP arrived at 11:25am]

The Chair stated that the completed surveys provide an insight to the significant issues that need to be raised in future meetings and that an 'Other' option was added so that members could add comments.

4) Subgroups

a. Raw materials definition update

The Chair explained that this is connected to the priority items, adding that there are currently three subgroups for Communications, Data and finally, Documents & Guidance which the raw materials definition project sits in. The Chair followed on to state that there is an additional Fuel Quality Subgroup due to be formed and the Panel need to agree on which members would like to take part.

The Chair asked for volunteers to participate into subgroups so that progress can be made outside of the main Panel meetings. For example, there is a broad communications plan to engage stakeholders. For those who weren't involved, there are several stakeholders that BSL can communicate with to demonstrate sustainability and legality. This area needs to be improved on as currently there is no public availability on what the carbon footprint of fuels is etc.

TM asked if the BSL Administrators have communications with other industry bodies to ensure the BSL is parallel with other organisations. The Chair agreed that there are BSL Panel members who are a part of NGO's and associations which can ensure definitions are aligned.



The BSL Administrators confirmed that Ofgem (specifically the RHI team) and the BSL work together to ensure communications are aligned. MSo added that this needs to be aligned across the market suggesting that UKPC, WHA, WRA, REA should be involved. MSo, JT, LC, JMJ, HBF agreed to take part.

The Panel then moved on to the Data Subgroup, suggesting that more can be done to improve the quality of the data sets. The BSL Administrator added that the Quarterly Reporting split was an action that came out of the Data Subgroup and that the data should show more useful information in time. The BSL Administrator also stated that when the scheme and website was launched, the portal was created with a quick turnaround time, so the real data is full of code and needs to be manipulated specifically for each Panel meeting, which required a lot of resource.

The portal needs a review so that the BSL Administrators can export it in an easy format. In addition to this, attention is also required to understand what the Panel would like out of it. The Chair's view is to re-launch the data subgroup if need be.

NC added that BEIS want the biomass market to make a point in terms of carbon abatement and that clarity from the data is a positive step. DK pointed out that the message must be clear, for example, driving pellets on a train isn't the normal trend associated with chip.

MS said that considerations need to be made in terms of "waste" and would rather it be "Grade A recycled chip". The definitions for the fuel types need to be clear and NC confirmed that this is what the Government is working on. JT said that consumers using this type of fuel will not have knowledge of this (Grade A) and feels it should be called "pre-consumer". In terms of a definition, it is 'clean untreated waste wood' as "Grade A" is going to confuse consumers more. The Chair said this will be covered in the raw material definitions.

MA stated that Panel members are here to represent BSL suppliers and all considerations need to be taken into account. Customers can find the price of fuel but do not have sight of any added value e.g. emissions. TM also added that consumers need to see the chain of custody in terms of FSC. The Chair explained that this a communication issue. The data clearly feeds the communication, and this should sit in the Communications Subgroup.

Action 10-01	BSL Administrators to organise the next communications subgroup meeting, adding CO ₂ emission to the agenda.
--------------	---

Moving on to the raw materials definitions, the BSL Administrators explained that a review was needed due to definition discrepancies across different industry bodies and that Panel's approval was required before any changes are finalised.

The definitions were circulated to the Panel once the proposed changes were made during a teleconference between the BSL Administrators, HBF, DM and Ofgem. Comments were provided by AM via Huddle. HBF went through the rest of the document and explained the changes.

MA suggested that this becomes a part of the Documents & Guidance Subgroup and take the work offline, as it was proving to be too time consuming and wouldn't not get finished during the meeting. It was agreed that the updated version was circulated for comment and that the feedback went to the subgroup to agree the changes.

Action 10-02	BSL Administrator to re-circulate the updated raw materials definitions to Panel.
--------------	---

Action 10-03	Panel to provide comments on raw material definitions, within two weeks of circulation, for the Documents & Guidance subgroup to then review.
--------------	---



5) BSL Administrator update

The BSL Administrator provided an update on scheme activity, explaining that slides had been condensed to save time during the meeting, but all records of monthly activity can be found in the Supporting Documents on Huddle. Additional information of the slides included time spent on applications, audit applications/reports, finances, governance for contract meetings, partner meetings and Panel meetings, helpdesk, IT and data reporting. It was also explained that the BSL Administrators have an internal tracker which logs any activity.

DK asked how many BSL numbers there are and if an audit is done on the fuel or supplier. The BSL Administrators confirmed that it is for fuels and also explained to the Panel that the time shown is not including Woodsure's time. They went onto further explain that updates have been done for application user guides to try to reduce the volume of helpdesk enquiries etc.

Recently, the first BSL newsletter was published in January 2019 and the next one is due to go out at the end of April. The draft document was presented to the Panel and the BSL Administrators stated that the newsletter currently covers scheme updates, upcoming changes, specific events etc. They went onto explain that this is the second one and requested any feedback from Panel. It was also explained that Ofgem/BSL continue to share articles in their respective newsletters.

The Chair suggested that in future only the Communications Subgroup should be circulated with newsletters for comment. NC said it looks smart and engaging adding that crossover from Ofgem is pleasing and that additional channels to aid consumers should be explored.

The administrator update included the costs recovered and incurred for the last financial year. An additional line was introduced to show the surplus (£41k) which has accumulated in the scheme, at the end of last financial year and that the Panel can provide advice on where the surplus can be used. The Chair asked if this level of surplus will continue if the BSL maintains its current operation. The BSL Administrators clarified that the surplus last year was lower due to IT costs and changes to the scheme portal.

The Chair raised the responsibility of the Panel which is value for money and what to do with the surplus. NC stated that Gemserv's bid represented value for money and that they are happy with the level of service. The Chair added that this is the first time that Panel have been in a situation where a significant enough surplus has been accumulated to discuss it as an item. This could mean that Panel decide to reduce the rates/fees or to add additional enhancement e.g. improve the dataset.

The Chair proposed that this is taken offline and brought back to another Panel meeting. LC said that the number of biomass installations (and subsequently the number of woody biomass fuels) is dropping off and may be something to consider regarding the surplus.

AM said that the surplus is not enough and so it should be left alone to enable further accumulation to then use when needed. NC stated that international audits may be worth exploring. AH added that in the past, Woodsure have contacted local auditors to carry out the audits which could be an avenue to explore.

Action 10-04	The Chair to have a conversation with BEIS to see how the Panel can enable the delivery of value for money.
--------------	---

NC stated that the Panel need to take a certain and significant in-depth look in the next few months to see what the BSL looks like post 2021 (RHI closure). What is the role after this point and would like it to be stronger and industry facing.

TM questioned the number of removals and why they are carried out. The BSL Administrator states that the last meeting had shown the number of removals and the reasoning behind them, which can be found on Huddle.

The new quarterly reporting slide was shown depicting the split to consumers and industry. The Chair said that it was positive to see that the work done last year from the Data Subgroup, has now materialised but still needs time to show real value. NC highlighted that it would be good to see how many haven't reported, if data can be shown cumulatively.

Action 10-05	BSL Administrator to show how many Suppliers have outstanding reporting.
--------------	--



Action 10-06	BSL Administrator to record cumulative quarterly reporting figures.
--------------	---

NC also stated that reducing the number of Supplier non-compliances during a BSL audit, can be a way that could save money for the Scheme.

TM stated that he made a request at the last meeting to see if Self-Supplier fuel quantities can be obtained. This brought the Panel on to the Ofgem update agenda item.

6) Ofgem update

LB firstly addressed the action on Self-Supplier fuel quantities used to claim the RHI, which was requested by TM. LB went onto explain that when data is collected, the Kwh (thermal output) is requested but not the quantity fed into boiler installations. An analysis was carried out to see how easy it is to obtain considering output. The team within the RHI department concluded that there were too many variables to consider due to several fuels used in the same appliance, the efficiency of the boiler, heat losses etc.

LB mentioned that records of the types of fuel purchased is required at the RHI audit stage but many of the non-compliances on the RHI are due to a lack of these records – this is not a major non-compliance.

TM said this action came about as Self-Suppliers are not included in the BSL quarterly reporting.

AH asked whether the total Kwh output is possible to share, as rough assumptions can then be made. LB said this would be an overestimate as they might use more than one feedstock.

TM said he records all quantities used and is reporting it, why can this not be extracted or used. At the end of each year, he is asked to declare how much fuel used. LB and BSL said that this isn't a requirement – the Chair questioned who TM is reporting to.

Action 10-07	TM to find out where he is reporting his annual data and what it is being used for.
--------------	---

LB went on to add that Ofgem presented at the WHA conference to provide updates on enforcement and that audit numbers have been ramped up. He explained that over the last two financial years 609 audits have been conducted and the last financial year totalled 720 audits. Additionally, there has been a focus on collaboration with companies such as Woodsure and HETAS. LB went onto explain that there was a joint audit with Environment Agency (EA) and police which was a pre-accreditation audit, resulting in no accreditation.

LB explained that an installer on the MCS scheme, had their accreditation lapsed and the individual was involved in several biomass installations. The police managed to get a conviction which acts as precedent to say that police may be involved in fraud cases.

Ofgem are also working alongside Woodsure via referrals from the BSL Administrators. Under the RHI Regulations Ofgem do have powers to take enforcement action if regulation outside of the RHI are breached, such as environmental permitting or planning permission. For Ofgem to take action, a clear decision is needed from the relevant authority involved with the Regulations that sit outside of the RHI.

JL questioned if emission certificates are looked at, as operators may be fraudulent. He went on to ask if this is looked at and if they have come from an accredited institution. LB said that they come from testing houses and are therefore investigated. JL followed up saying that a colleague of his reviewed a significant amount of emission certificates that are fraudulent. LB advised whistleblowing and that Ofgem would be interested to investigate.

MS questioned whether there is any credible information on what has happened to RHI Suppliers that have had payments stopped which could be captured in the BSL newsletter. LB responded that a short article on enforcement can be used in the BSL newsletter.

HBF proposed to publish the number of fuels that have been referred to Ofgem and or the EA. LB agreed that this could be a good point to show consumers that both organisations are working closely.



Action 10-08	BSL Administrator to include RHI statistics from Ofgem in the next BSL newsletter.
--------------	--

TM stated that as well as negatives, there must be positive points to balance the newsletter. This is something that should be picked up by the communications subgroup.

LC stated that after so many running hours, it should be a requirement to check that the emissions certificate is still valid. AM agreed and feels that boilers should have an 'MOT' which could lead to scrappage schemes if the installations are fail?.

7) BEIS update

The Chair requested that TO introduce himself whilst the Panel wait for NC to present the BEIS update. TO introduced himself to the Panel and gave a high-level overview of this experience to date.

NC re-iterated the team changes in BEIS and TO's start within the RHI policy team. BEIS have looked to carve up what they are doing in their senior team, and as a result TO will be leading in biomass and this will be NC's last BSL Panel meeting. NC will be running the RHI scheme closure and TO will be the main point of contact in 'how to improve compliance' and the way biomass is looked after post RHI 2021. The aim is to establish technology groups by the summer with a view to consulting in early 2020.

BEIS have reviewing legislative approvals required which has meant a wider level of clearance is need than initially anticipated. The Department for Environment, Food and Rural Affairs (DEFRA) clearance will follow shortly. Elements relating to quality in the urban biomass response will be picked up closer to closure. Ultimately, Panel will need to make recommendations in all elements of the industry.

NC continued in that installation quality is something that BEIS would like to hear from the Panel but fuel quality should be the main focus.

BEIS will be conducting ratification work for the future of this Panel and the BSL. Gemserv contract has now been extended to June 2021 but focus is required from the Panel to shape the future of BSL.

8) Fuel quality

The Chair introduced the fuel quality agenda item. He explained that there is an opportunity to put quality into BSL for which the scope is yet to be defined. Many of the Panel members wanted to be a part of the subgroup focussing on this. The Chair felt that Panel need to determine the scope and scale of the work over time. It is potentially quite a big issue and may have sub areas of work that need to be dealt with and may require further subgroups. Timescales and schedules will need to be put into place. The BSL Administrator made it clear that even if a Panel member is not a part of a particular subgroup, oversight will always be present as any outcome will be shared via Huddle.

The Chair presented a strawman of potential review opportunities post RHI which include air quality, operational efficiency, legality and use of wastes. He added that Panel need to work backwards from 2021 and to allow large amount of time for consultation. NC commented that he thinks it's possible for Panel to establish a high-level position by July 2019, then following a public consultation document toward the end of the year. In terms of what goes into the consultation, this will be a high-level policy proposition. This position will be one Panel comes to but for the time being an agreed view on direction should be sorted sooner rather than later. It was noted that the scope needs clarifying by BEIS. NC indicated that the focus is primarily fuel quality, but installation quality is something to consider too.

The fuel quality aspect is composed of types of fuel, categories of fuel, existing standards and accreditation bodies etc. Monitoring and enforcement need to be considered as well as any impact on suppliers. This includes what needs paying for and how is it going to be paid for. Something to consider is if quality is introduced onto the BSL and people are already members of ENplus, Woodsure etc, how does that get captured.

The Chair felt that it is too big a topic for a single subgroup so a smaller subgroup should be created in order to bring back a proposal to the group for areas to work on. This will be done before July's meeting so that work areas can be identified, and the high-level topics can be drafted by the next meeting.



The new high-level quality subgroup is formed of HBF, JL, AC, AH, LC, JT, JMJ, DK, & MA.

Action 10-09	New quality subgroup to work on fuel quality framework, with the aim to present a high-level decision and options paper at the July 19 th Panel meeting.
--------------	---

9) Global Forestry Register

HBF requested this to be an agenda item because the Global Forestry Register (GFR) is the BSL's main element of sustainability – land and sustainability criteria. A risk based regional assessment is done on certain elements and there are currently no rules to deal with risk change on the BSL. Risk does change over time and the slides show the increased risk on the GFR. Anything that was not 'green' was asked to supply category A evidence. HBF added that changes have been throughout Europe – Latvia, Lithuania, Poland, Spain, Portugal & Belarus. Risks have changed slightly and include risks relating to harvesting issues. The UK on corruption index is 11/180. IT explained to HBF that if it's on the economic side i.e. taxes and fees, he doesn't mind about that so much as the harvesting activities themselves are damaging environment and that's where Panel should start looking.

HBF posed questions to the Panel in terms of applying the rules such as, new applications and existing applications must have the same rule, what date is the rule change? What is practical and reasonable? HBF presented a soft approach and a hard approach which needs to be considered.

NC said with the current political state of affairs, EU countries may not be appropriate at the moment. The BSL Administrators advised that they can look at the evidence of these applications and make decisions based on the outcome of this.

MA felt that the risk is slightly misunderstood. If a country is 100/100, several suppliers have FSC, PEFC and RBRA's. If the supplier transitions from green to yellow, whilst the trend has moved and risk increased slightly, there is no need to have this in place by June.

HBF requested Panel's thoughts on the practicality of the above. The Chair decided that any views on this should be raised with HBF and a decision made by BEIS.

Action 10-10	Panel to provide feedback on the Global Forestry Risk Register so that BEIS can then make a decision.
--------------	---

10) AOB

JL asked that why the EA have not been invited to this Panel meeting. The Chair responded that typically if waste wood is on the agenda, then the EA will be involved. JL felt that the EA should be present at every meeting. NC stated that BEIS would like to have a representative from DEFRA and the EA.

No other issues were raised. The meeting was concluded.

The next meeting is due to take place on 17th July in Telford.



Appendix – List of meeting attendees

Member name	Organisation	Attendance
Julian Morgan-Jones (Chair)	SEWF	Y
Mark Appleton	Forest Fuels Ltd	Y
James Little	Energy Solutions Consulting	Y
Andrew Mcfadzean	JM Envirofuels	Y
Amanda Calvert	Small Woods Association	Y (dial-in)
Mark Sommerfeld (MSo)	REA	Y
Dan Kinash	New Forest Energy	Y
Lucy Clark	LC Energy	Y
Bruno Prior	Forever Fuels	Y
Julia Turner	WRA	Y (dial-in)
Duncan Mackinnon	Tilhill Forestry	Y (dial-in)
Tim Mack	Elderslie Estate	Y
Malcolm Snowie (MS)	Scot Heating Company	Y
Nic Crowe	BEIS	Y
Tunde Ojetola	BEIS	Y
Luke Bailey	Ofgem	Y
Helen Bentley-Fox	Woodsure	Y
Andrew Hopton	HETAS	Y
Imogen Jamie	Gemserv (BSL)	Y
Neeraj Vasani	Gemserv (BSL)	Y
Apologies		
Kirsty Rice	National Trust	N
Ross Lowrie	Self-Supplier	N
Richard Coulson	RWE	N
Ian Tubby	FC England	N
Paul Gibbon	Mistral Energy	N
Jason Hubert	FC Scotland	N
Andrew Heald	Confor	N