



Department  
of Energy &  
Climate Change

# Woodfuel Advice Note

22 December 2014

© Crown copyright 2014

URN 14D/482

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence.

To view this licence, visit [www.nationalarchives.gov.uk/doc/open-government-licence/](http://www.nationalarchives.gov.uk/doc/open-government-licence/) or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: [psi@nationalarchives.gsi.gov.uk](mailto:psi@nationalarchives.gsi.gov.uk).

# Contents

1. Introduction .....	4
2. Who do the woodfuel land criteria apply to? .....	5
3. What are the woodfuel land criteria?.....	8
Legal source .....	8
Sustainable source .....	9
Consignment .....	10
Mass Balance.....	11
4. Evidence – Timber Standard Category A and B .....	13
What is evidence for Timber Standard Category A? .....	13
How do I demonstrate evidence for Timber Standard Category A? .....	13
Mixed Claims.....	16
Timber Standard Category B bespoke evidence .....	16
Risk-based regional approach .....	16
5. Annual compliance.....	19
6. Special cases.....	20
Waste material .....	20
Energy Crops .....	20
FLEGT .....	20
Deemed Sustainable .....	21
Bioliquids.....	21
Other Biomass.....	21
7. How does the Timber Standard compare to the Timber Procurement Policy? .....	23
8. Where can I get more help?.....	24
9. Glossary.....	26

# 1. Introduction

This document sets out the woodfuel land criteria as defined in the Timber Standard and describes how generators and installations can comply with the criteria.

- 1.1. The UK government announced its decision to bring in sustainability requirements for the use of feedstocks that are virgin wood or made from virgin wood, for reporting purposes from April 2014. These requirements are mandatory for receiving support under the Contracts for Difference (CfD) and are to be made mandatory (subject to Parliamentary approval) for receiving incentives under the Renewables Obligation (RO)<sup>1</sup> and under the domestic and non-domestic Renewable Heat Incentive (RHI)<sup>2</sup>.
- 1.2. The Timber Standard for Heat and Electricity<sup>3</sup> (the Timber Standard) sets out the *woodfuel land criteria* for claimants under the RO, CfD and RHI. This guidance document and the associated Timber Standard Mass Balance and Consignment, and the Risk-Based Regional Assessment: A Checklist Approach document interpret how generators and installations can comply with these criteria (these can be found [here](#)). The Timber Standard draws upon the principles set under the UK government Timber Procurement Policy (UK-TPP). The principles cover a range of social, economic and environmental considerations that are part of good sustainable forest management practices and are based on internationally agreed criteria<sup>4</sup>. For more information on how the Timber Standard and UK-TPP differ, see section 7.

---

<sup>1</sup> DECC (2013) Government Response to the sustainability requirements for solid biomass feedstocks used for electricity under the Renewables Obligation (RO):  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/231102/RO\\_Biomass\\_Sustainability\\_consultation\\_-\\_Government\\_Response\\_22\\_August\\_2013.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/231102/RO_Biomass_Sustainability_consultation_-_Government_Response_22_August_2013.pdf)

<sup>2</sup> DECC (2012) Government Response to non-domestic Renewable Heat Incentive consultation  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/128679/Gov\\_response\\_to\\_non\\_domestic\\_July\\_2012\\_consultation\\_-\\_26\\_02\\_2013.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/128679/Gov_response_to_non_domestic_July_2012_consultation_-_26_02_2013.pdf)

<sup>3</sup> Timber Standard for Heat & Electricity: Woodfuel used under the Renewable Heat Incentive and Renewables Obligation

<sup>4</sup> The Pan-European Criteria and Indicators, and Operational Level Guidelines for Sustainable Forest Management, as endorsed by the Lisbon Ministerial Conference on the Protection of Forests in Europe (June 1998), the UNCED Forest Principles (Rio de Janeiro, June 1992) and the ITTO criteria and guidelines for sustainable forest management.

## 2. Who do the woodfuel land criteria apply to?

- 2.1. Generators using virgin wood or feedstocks made from virgin wood as a solid or gaseous fuel, and claiming incentives under the RO, CfD or RHI, must comply with the following:
- Monthly (RO  $\geq$ 1MW, CfD) and Quarterly (RHI): Meet their greenhouse gas savings (GHG) criteria per consignment. This guidance document will not provide detail on complying with the GHG criteria but see [the Biomass and Biogas Carbon Calculator \(B2C2\)](#) for further information. For RO generators, the Ofgem website provides further guidance; Ofgem and the [Biomass Suppliers List \(BSL\)](#) will be providing further guidance and information for RHI participants.
  - Monthly (RO  $\geq$ 1MW) and Quarterly (RHI): Meet the woodfuel land criteria on a consignment or mix of consignment basis (see section 3). This guidance document will set out these requirements.
  - Annually (RO, RHI)  $\geq$ 1MW: Prepare an annual sustainability report which is compiled by a third party auditor/verifier in accordance with ISAE 3000 or equivalent standard requirements. This is required only for generating stations with a total installed capacity (TIC) greater than or equal to one megawatt.
- 2.2. Generators reporting to Ofgem under the RO and RHI must accredit with Ofgem. For the RO this includes agreeing [Fuel Measurement and Sampling \(FMS\)](#) procedures on an ongoing basis. RHI applicants self-reporting to Ofgem must also complete FMS procedures. More information on eligibility and metering for RHI can be found here for RHI [domestic](#) and [non-domestic](#). Further Ofgem RO guidance on sustainability can be found [here](#).

**Table 1: Reporting requirements**

Capacity (kW)	Monthly reporting of GHG and woodfuel land criteria (RO, CfD)	Quarterly reporting of GHG and woodfuel land criteria <sup>5</sup>	Annual reporting: profiling data <sup>6</sup>	Annual reporting: audit report	Link to incentive issue (RO)
≤50 DNC <sup>7</sup>	No	Yes	No	No	Yes – RHI No
>50 DNC - <1000 TIC	No	Yes	Yes	No	Yes - RHI No – RO/CfD
≥1000 TIC	Yes	Yes	Yes	Yes	Yes

This table applies from the date of entry into force of RO Orders and RHI Regulations in 2015.

- 2.3. Generators using virgin wood, or feedstocks made from virgin wood (including sawdust), with capacity *greater than or equal to one megawatt*, and claiming incentives under the RO, must comply with the woodfuel land criteria and **must report monthly to Ofgem**.
- 2.4. All RHI Participants using virgin wood, or feedstocks made from virgin wood, generating *greater than one megawatt*<sup>8</sup>, and claiming incentives under the RHI must comply with the woodfuel land criteria and GHG criteria. **They must report quarterly to Ofgem**, whether they use wood from a BSL supplier or not:
- **Using wood from suppliers registered on the BSL** – Suppliers intending to supply RHI participants should register on the [BSL](#) and will be required to demonstrate to the List Administrator that they meet the woodfuel land criteria, as per their guidance. Participants are required to report their BSL volumes to Ofgem every quarter. Ofgem guidance will detail what sustainability data should be reported.
  - **Using wood from non-BSL suppliers** – this wood will be **self-reported** to Ofgem on a quarterly basis. Ofgem guidance will set out what sustainability data should be reported to Ofgem. Note that non-BSL wood will need to be independently audited at year-end if a participant's total installed capacity is ≥1MW.
- 2.5. If, under the RHI, a participant's installation is less than 1MW capacity<sup>9</sup> and if they source woodfuel (which they have the legal right to source, through ownership, rental or other relevant arrangement) from the same estate as the boiler (or within 50 miles of the installation), then they would be considered as a **self-supplier**. Self-suppliers must

<sup>5</sup> Only applies to RHI self-reporters (those reporting directly to Ofgem and not listed on BSL).

<sup>6</sup> Applies to RO and CfD. For RHI, this applies to biomethane and self-reporters only

<sup>7</sup> DNC = Declared Net Capacity

<sup>8</sup> Total installed capacity (TIC) equal to or greater than 1MW

register with the BSL, though they are not required to comply with the woodfuel land criteria and GHG criteria as self-suppliers are deemed to be sustainable.

- 2.6. However, a self-supplier<sup>10</sup> may supply woodfuel to other generators. Whether they choose to do so as a BSL supplier or a non-BSL supplier, they must comply with the woodfuel land criteria and GHG criteria. If a self-supplier wishes to supply a BSL fuel, they should discuss with BSL and comply with BSL supplier requirement. For further guidance on the application and requirements for self-suppliers, see the BSL website, [here](#).

---

<sup>10</sup> Self suppliers definition does not include supply to others under BSL

## 3. What are the woodfuel land criteria?

- 3.1. To comply with the woodfuel land criteria, generators and participants must demonstrate that **all** their woodfuel supplied under the RO and RHI is legal and that at least 70% of all woodfuel meets the definition of 'legal and sustainable' (this minimum requirement is called the '70/30 threshold' in the following). Generators and their suppliers are encouraged to maximise the proportion of 'legal and sustainable' woodfuel they use.
- 3.2. Generators and participants must meet the 70/30 threshold per consignment, or across a mix of consignments, such that at least 70% of the total woodfuel reported to Ofgem is 'legal and sustainable'. 'Consignment' is defined below.
- 3.3. Suppliers to the BSL are required to meet the 70/30 threshold, as per the BSL guidance. Ofgem guidance will set out how participants should report BSL supplied wood, as well as how generators and self-reporters should report.

### Legal source

- 3.4. Woodfuel originates from a legal source if it has been *legally harvested*. For this purpose, 'legally harvested' has the same meaning as in Article 2 of the [EU Timber Regulation](#) (EUTR) which is:
- 3.5. "Harvested in accordance with the applicable legislation in the country of harvest".
- 3.6. "'Applicable legislation' means the legislation in force on the country of harvest covering the following matters:
  - rights to harvest timber within legally gazetted boundaries,
  - payments for harvest rights and timber including duties related to timber harvesting,
  - timber harvesting, including environmental and forest management including forest legislation and biodiversity conservation, where directly related to timber harvesting,
  - third parties' legal rights concerning use and tenure that are affected by timber harvesting, and
  - trade and customs, in so far as the forest sector is concerned."
- 3.7. EUTR is enforced in the UK by the Timber and Timber Products (Placing on the Market) Regulations 2013. The EUTR applies to timber or timber products – including woodfuel - whether these are used for energy generation or for any other purpose. The EUTR applies irrespective of whether a generator is seeking financial support such as RO and RHI or chooses not to.
- 3.8. The EUTR makes it an offence to place illegal timber on the EU market. It requires those companies that place timber or timber products on the EU market for the first time to assess the risk that those products may have come from an illegal source and to mitigate any risks. This is known as due diligence (see article 6 of the EUTR) and must happen before the product is bought. It has to be undertaken even if the product is certified (e.g. FSC or PEFC).
- 3.9. If you buy woodfuel from within the EU and for which due diligence has taken place you must keep records of whom you bought the product from and, where applicable, to

whom you have sold the woodfuel. This information must be kept for at least five years, and be provided for checks if requested.

- 3.10. This document does not provide further guidance on compliance with the EUTR. For more information [contact](#) the National Measurement Office (NMO); also see [here](#).
- 3.11. Note that the requirement of 'legal source' as set out above is a separate requirement to the sustainability criteria S1-S10 because all timber and timber products placed on the EU market for the first time must be legally harvested as set out in Article 2 of EUTR; However, wood cannot be considered sustainable if it is not also legal. Also note that purchasing or selling certified material does not automatically imply compliance with EUTR, so both Timber Standard Category A and B evidence must be able to provide sufficient and credible evidence of EUTR compliance.

## Sustainable source

- 3.12. The Timber Standard defines 'sustainable source' as a source which is compliant with criteria S1-S10 as outlined below:

S1. The definition must be consistent with a widely accepted set of international principles and criteria defining sustainable or responsible forest management at the forest management unit level.

S2. The definition must be performance-based, meaning that measurable outputs must be included and cover all of the issues set out in S5 to S10.

S3. The process of defining sustainable must seek to ensure balanced representation and input from the economic, environmental and social interest categories.

S4. The process of defining sustainable must seek to ensure: no single interest can dominate the process for setting or changing the policy; And no decision on the contents of the policy can be made in the absence of agreement from the majority of an interest category.

S5. Management of the forest must ensure that harm to ecosystems is minimised. In order to do this the policy must include requirements for: appropriate assessment of impacts and planning to minimise impacts; protection of soil, water and biodiversity; controlled and appropriate use of chemicals and use of Integrated Pest Management wherever possible; and proper disposal of wastes to minimise any negative impacts.

S6. Management of the forest must ensure that productivity of the forest is maintained. In order to achieve this, the policy must include requirements for: management planning and implementation of management activities to avoid significant negative impacts on forest productivity; monitoring which is adequate to check compliance with all requirements, together with review and feedback into planning; operations and operational procedures which minimise impacts on the range of forest resources and services; adequate training of all personnel, both employees and contractors; and harvest levels that do not exceed the long-term production capacity of the forest based on adequate inventory and growth and yield data.

S7. Management of the forest must ensure that ecosystem health and vitality is maintained. In order to achieve this, the definition of sustainable must include requirements for: management planning which aims to maintain or increase the health and vitality of ecosystems; management of natural processes, fires, pests and

diseases; and adequate measures to protect the forest from unauthorised activities such as illegal logging, mining and encroachment.

S8. Management of the forest must ensure that biodiversity is maintained. In order to achieve this, the policy must include requirements for: implementation of safeguards to protect rare, threatened and endangered species; the conservation/set-aside of key ecosystems or habitats in their natural state; and the protection of features and species of outstanding or exceptional value.

S9. The forest management organisation and any contractors must comply with local and national legal requirements relevant to: labour and welfare; and health and safety.

S10<sup>11</sup>. Management of the forest must have full regard for: identification, documentation and respect of legal, customary and traditional tenure and use rights related to the forest; mechanisms for resolving grievances and disputes including those relating to tenure and use rights, to forest (or land) management practices and to work conditions; and c. safeguarding the basic labour rights and health and safety of forest workers.

## Consignment

- 3.13. Woodfuel must be reported on a consignment basis to ensure sufficient disaggregation of sustainability data and allow correct GHG calculations.
- 3.14. Whilst the RO and the RHI legislation do not define 'consignment', Ofgem have set out [guidance](#) on what constitutes a consignment<sup>12</sup>. For practical reasons the definition of a consignment for GHG criteria and for meeting the woodfuel land criteria are the same. Each consignment should constitute the same **characteristics** in terms of:
- Feedstock types<sup>13</sup>
  - Biomass form (solid biomass only)
  - Country of origin<sup>14</sup>
  - Classification of the fuel<sup>15</sup>
  - Compliance with the woodfuel land criteria
  - Compliance with GHG criteria
- 3.15. Generators (and participants using wood supplied by non-BSL suppliers) are recommended to discuss with Ofgem what constitutes a 'consignment' for their operation when agreeing Fuel Measurement and Sampling (FMS) procedures.
- 3.16. The RO, CfD and RHI require that woodfuel reported to Ofgem should be at least 70% sustainable – this can apply per consignment, per mix of consignments used (RO/CfD), or across all consignments reported in any quarter (RHI).

---

<sup>11</sup> This criteria corresponds to UK-TPP SC1-3

<sup>12</sup> The CfD contract specifies what constitutes a consignment

<sup>13</sup> This is to ensure that different biomass fuels are not grouped together, eg wood cannot be considered the same as sunflower pellets or rapeseed oil cannot be considered the same as used cooking oil.

<sup>14</sup> UK considered as a single country of origin

<sup>15</sup> See appendix 10 of Ofgem [sustainability guidance](#) for common fuel classifications:

- 3.17. Generators and self-reporting participants may use mass balance systems to apportion their sustainability data as appropriate, and should discuss this system with Ofgem where in doubt.
- 3.18. In calculating the proportion of woodfuel reported which is 'legal and sustainable' in a quarter, BSL wood is considered to be 70% 'legal and sustainable', unless evidence can demonstrate a higher proportion.
- 3.19. Ofgem will prepare guidance setting out exactly what information generators and participants will have to report on their systems per consignment. Participants reporting BSL supplied wood will have less information to report – e.g. BSL woodfuel will not have to be broken into its component characteristics but can be reported as one consignment. In all instances, generators and participants must declare that woodfuel meets the GHG criteria and woodfuel land criteria – BSL wood is deemed to always comply with these criteria.
- 3.20. Woodfuel reported to Ofgem from generators and self-reporting participants must have supporting sustainability evidence. Evidence will be audited at the end of the year, but Ofgem may request to see evidence at any time.
- 3.21. Further information on consignments and mass balance can be found in the Timber Standard Mass Balance and Consignment guidance (found on this [web page](#)).

## Mass Balance

- 3.22. To report accurately against the 70/30 threshold for each consignment or mix of consignments of biomass, and for the information to be independently verified, the information about 'legal and sustainable' source must be traceable through the supply chain. The concept of traceability from the end product back to the raw material is known as the 'chain of custody'.
- 3.23. The Timber Standard permits the use of a mass balance approach (MBA). A MBA is a means of accounting for the flows of woodfuel material using a defined system during a defined period of time. In this system, sets of sustainability characteristics such as the origin from 'legal and sustainable' or 'legal only' source can be transferred between consignments or mix of consignments. However, a node<sup>16</sup> in the supply chain can only use or sell biomass with the same sustainability and legality characteristics and in the same volume as the biomass they took in originally, taking account of any conversion factors or losses in production, less any biomass they have recorded as being used or sold previously.
- 3.24. Operating a MBA may be necessary if you;
  - Do not have 100% or do not always source 'legal and sustainable' material
  - Buy from many different sources of woodfuel
  - Have limited internal processes to avoid mixing of 'legal and sustainable' and 'legal only' material
  - Already account for some or all of your woodfuel using mass balance methods (including credit systems)

---

<sup>16</sup> A node in the supply chain refers to any entity who legally owns the wood at some stage in the supply chain

- 3.25. The RO, CfD and RHI Orders do not expressly state that operators must use a MBA but a MBA is recommended as a useful tool for the correct accounting and reporting of the 70/30 threshold and for ensuring that accurate information about the origin of the woodfuel passes through the supply chain whilst allowing material with differing percentages of 'legal and sustainable' and 'legal only' content to be mixed. Suppliers who only supply 100% of 'legal and sustainable' woodfuel to all of their customers do not need to use a MBA.
- 3.26. Under the BSL suppliers will be required to meet the 70/30 threshold and are encouraged to use a MBA.
- 3.27. To identify whether the use of a MBA is required, the operator must first determine the number of consignments they are using and whether these are being mixed at the generating station or elsewhere in the supply chain. Where the consignments are being mixed, a MBA should be used to trace the biomass and its associated sustainability and legality characteristics. Generators for RO and CfD and suppliers for RHI should seek relevant information from their suppliers and participants respectively to understand the ratio of 'legal and sustainable' versus 'legal only' material within the biomass they are receiving and if they receive a single consignment or a mix of consignments.
- 3.28. For further detail on the MBA, see the Timber Standard Mass Balance and Consignment guidance document.

## 4. Evidence – Timber Standard Category A and B

- 4.1. Two types of evidence are accepted as supporting claims that woodfuel is ‘legal and sustainable’:
  - Timber Standard approved schemes, also known as **Timber Standard Category A (TS Cat A)** evidence
  - Bespoke evidence, also known as **Timber Standard Category B (TS Cat B)** evidence.
- 4.2. As the Timber Standard Category B type of evidence provides an approach as rigorous as Timber Standard Category A, the UK Government does not have any preference for the type of evidence provided.

### What is evidence for Timber Standard Category A?

- 4.3. The Timber Standard Category A are voluntary third-party certification schemes benchmarked by the UK Government as meeting the woodfuel land criteria set out in the Timber Standard. At time of writing, these are the same schemes as recognised under Category A evidence of the UK-TPP, namely the Forest Stewardship Council (FSC) and Programme for the Endorsement of Forest Certification (PEFC). Ofgem will be benchmarking other independent certification schemes against the woodfuel land criteria. An up to date list of independent certification schemes recognised as providing Timber Standard Category A evidence will be available on the Ofgem website.
- 4.4. As the requirements of the Timber Standard and UK-TPP are different, Timber Standard Category A schemes and schemes accepted as UK-TPP Category A evidence may differ in the future.
- 4.5. Note that buying, producing or selling Timber Standard Category A voluntary third party certification schemes (or other voluntary scheme) does not automatically mean meeting EUTR legal requirements.

### How do I demonstrate evidence for Timber Standard Category A?

- 4.1. To demonstrate that raw material or woodfuel<sup>17</sup> is supplied under a Timber Standard Category A certification scheme, the raw material or woodfuel needs to be supplied with a “claim” under that approved scheme (i.e. it must be certified against that scheme). See Figure 1 below for further guidance on how to check the validity of a certificate and to ensure the product supplied is covered by the certificate.
- 4.2. The following websites should be used when checking the validity of a supplier’s certificate:

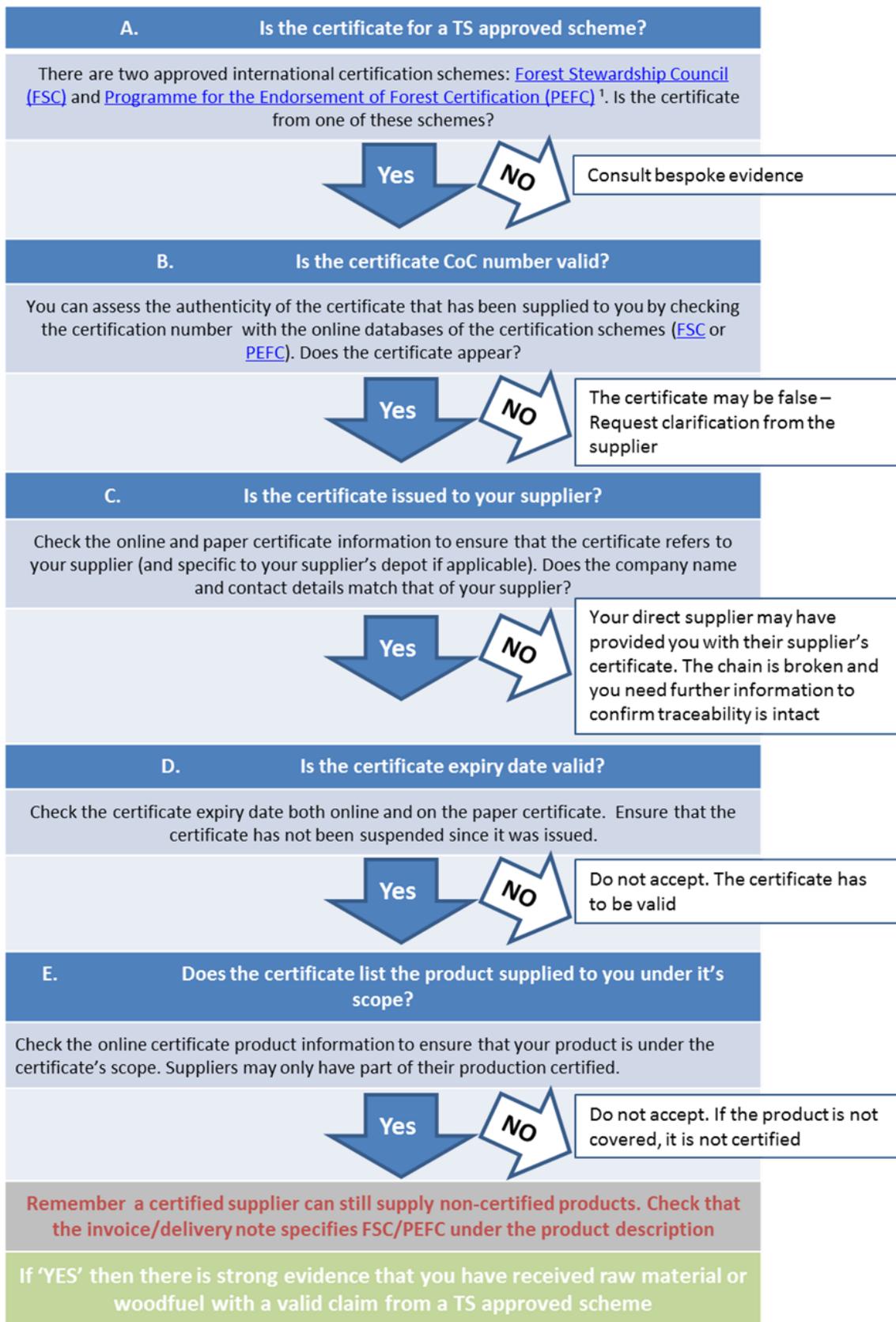
For FSC: <http://info.fsc.org/certificate.php>

---

<sup>17</sup> 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 BSL Q&A document (Issue 1.5) is this RHI specific, If so, make this clear.

For PEFC: <http://www.pefcregs.info/search1.asp>

- 4.3. A supplier cannot *supply* raw material or woodfuel as certified (by a Timber Standard approved scheme) if it is not itself certified to that scheme. The raw material or woodfuel must be covered under the scope of the supplier's certification. However, a supplier on the BSL, a generator or a participant *buying* certified woodfuel with a Timber Standard approved scheme claim, does not itself have to be certified to that scheme.
- 4.4. Examples:
- A generator does not have to be FSC certified to *buy* woodfuel with an FSC certified claim
  - A wood chip producer cannot *sell* material with an FSC claim unless he is FSC certified
- 4.5. Where there is a break in the chain of custody for Timber Standard Category A evidence (i.e. where a supplier in the supply chain is not certified) material cannot carry a Timber Standard Category A claim. Further evidence (Timber Standard Category B evidence) must be provided to demonstrate evidence of compliance with the woodfuel land criteria as set out in the Timber Standard. The upstream certified parts of the supply chain (supported by Timber Standard Category A evidence) may be used to complement this evidence.
- 4.6. Example
- A generator who is PEFC certified buys a consignment of woodchips originating from a PEFC certified forest from a supplier who is not PEFC certified. The wood chips cannot be PEFC certified when bought by the generator, but evidence that they originate from the PEFC certified forest may be included as a part of the Timber Standard Category B evidence.



<sup>1</sup> Or endorsed by PEFC

**Figure 1: Check the certificate for all certified woodfuel or raw material**

## Mixed Claims

- 4.7. Timber Standard Category A schemes may permit the mixing of raw material which is fully compliant with the scheme's sustainability standard with material which does not meet the sustainability standard in its entirety. This may be referred to as material 'with a mixed claim' (ie FSC 70% mixed or PEFC 70% mixed). In this case, only the proportion of the material that is fully compliant with the Timber Standard Category A scheme's sustainability standard shall be considered 'legal and sustainable'. The other proportion (called 'Controlled Wood' by FSC and 'Controlled Sources' by PEFC) shall be considered 'legal only'. See Timber Standard Mass Balance and Consignment guidance for more information on mixing.
- 4.8. Example:
- A hundred tonnes of woodchips are received with a valid FSC 70% mix claim. Seventy tonnes shall be considered 'legal and sustainable' and thirty tonnes 'legal only'.

## Timber Standard Category B bespoke evidence

- 4.9. Timber Standard Category B bespoke evidence is all forms of credible evidence other than independent certification schemes that indicate that the forest source meets the woodfuel land criteria. The Risk-Based Regional Assessment: A Checklist Approach document is one approach to help woodfuel buyers and suppliers provide such evidence – found [here](#).
- 4.10. BSL requires applicants submitting Timber Standard Category B evidence to use the Risk-Based Regional Assessment Checklist approach.
- 4.11. Woodfuel for which Timber Standard Category B bespoke evidence is provided must at least be traceable back to a supply base<sup>18</sup> but ideally to a specific forest management unit. If it cannot be traced back to a specific forest management unit, the Risk Based Regional Assessment checklist approach should be used.
- 4.12. As noted in the Checklist document, timber traceable to a forest with a valid felling license and a fully implemented Forest Management Plan in line with the UK Forestry Standard (UKFS) Requirements and Guidelines meets the woodfuel land criteria as set out in the Timber Standard. In this instance a risk based regional approach (or checklist) would not be required.

## Risk-based regional approach

- 4.13. The Timber Standard permits a **risk-based regional approach** that requires credible **evidence for low risk of non-compliance** with the woodfuel land criteria to be provided on a regional level. The approach requires firstly defining the supply base, secondly defining the corresponding region(s) and thirdly determining the risk that the woodfuel land criteria are not met across this supply base. Woodfuel used must at least be traceable back to this supply base which includes the original point of harvesting of all the woodfuel being assessed. If there isn't sufficient credible evidence of low risk for non-compliance with any of the criteria across the entire supply base available, then the woodfuel user must redefine the supply base or implement mitigation measures to reduce the risk of non-compliance with the woodfuel land criteria to low risk.

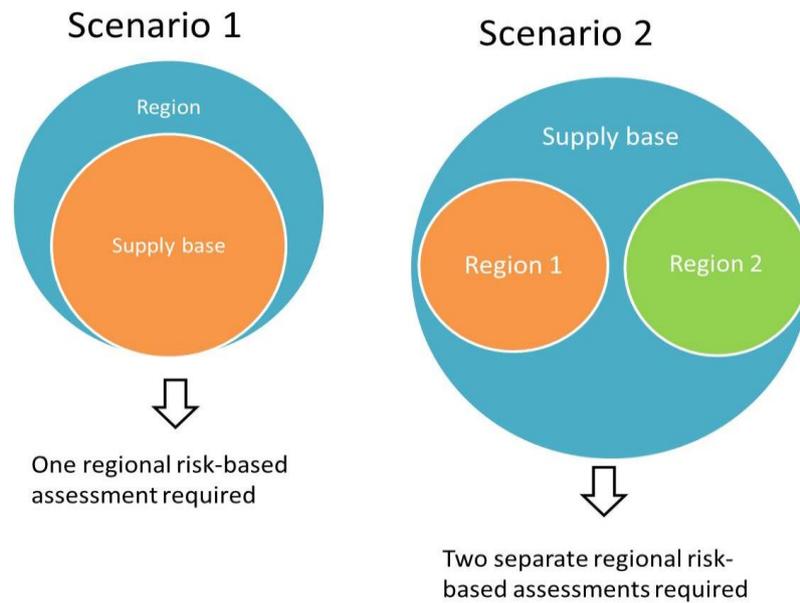
---

<sup>18</sup> See the Risk-Based Regional Assessment: A Checklist Approach document for a definition of supply base

- 4.14. The risk-based regional approach requires a thorough and rigorous assessment of the risks of non-compliance with the woodfuel land criteria as set out in the Timber Standard. Third party verifiers/auditors working in accordance with an ISAE 3000 or equivalent standard will assess the evaluation of risk for each criteria undertaken by generators under the RO. For biomass suppliers on the BSL, the List Administrator will assess the evaluation of risk as either 'adequate' or 'not adequate'.
- 4.15. The Timber Standard risk-based regional approach represents a different approach from Category B approach used in the UK-TPP where evidence of compliance with the sustainability requirements S1-S10 is to be provided for *each item* and where *each item* has to be traceable back to a forest management unit.
- 4.16. More information about the risk-based regional approach can be found in the Risk-Based Regional Assessment, a Checklist Approach document, found [here](#).
- 4.17. For additional guidance on how to provide Category B evidence for UK growers, see [CPET Guidance for the Growers of Timber in the UK](#). This document states that "Timber traceable to a forest with a fully implemented Forest Management Plan in line with the UK Forestry Standard (UKFS) Requirements and Guidelines meets the UK-TPP as suitable Category B evidence." Woodfuel compliant with the UK-TPP Category B evidence is also considered to comply with the Category B Timber Standard requirements.
- 4.18. Note that even when using a risk-based regional approach, EUTR must be complied with.

### **What is a region?**

- 4.19. As set out in the Timber Standard and in the Risk-Based Regional Assessment: a Checklist Approach document, a region can be defined as the largest area in which reliable and independent information is available at which conditions are sufficiently homogenous to evaluate the risk of non-compliance with the woodfuel land criteria. In a single 'region' we would expect that the following characteristics should be the same:
  - a) legislation covering land ownership, use and harvesting rights
  - b) legislation covering biodiversity, water, air and soil protection
  - c) legislation covering basic labour rights and health and safety of forest workers
  - d) legislation covering waste handling and disease control
  - e) legislation covering tree felling licensing and replanting/regeneration requirements.
- 4.20. The region selected for evaluation may be bigger than the supply base. Alternatively, the supply base may comprise multiple regions. Once the supply base and the region are defined, the risk of non-compliance with the woodfuel land criteria across the entire supply base must be assessed.



- 4.21. For the RO and CfD this assessment is the responsibility of the generator. For the RHI, it is the responsibility of the participant where non-BSL wood is reported (i.e. self-reporters). Only raw material or woodfuel determined to be at low risk of non-compliance with all woodfuel land criteria at the regional level shall be supplied as 'legal and sustainable'.
- 4.22. For participants using BSL wood, the BSL processes provide assurance that wood is 'legal and sustainable'. A BSL supplier may provide Timber Standard Category B evidence with a risk-based regional assessment, but the Biomass Suppliers List guidance will set out how this will be audited/verified.

## 5. Annual compliance

- 5.1. During the course of the year, generators and self-reporting participants must collect evidence which is **sufficient and credible** to demonstrate compliance with the Timber Standard.
- 5.2. As noted in chapter two, generators and participants with a total installed capacity greater than or equal to one megawatt must have an annual sustainability report compiled by a third party verifier/auditor qualified to an ISAE 3000 or equivalent standard. This report will be based on an audit of the Timber Standard Category A and B evidence that generators and participants have collected from the supply chain.
- 5.3. Participants using only BSL wood do not need to complete an annual audit report (although they must still provide profiling data – Ofgem will provide guidance. Ofgem may still require an annual report, but would not require the report to be audited). Participants who self-report any non-BSL wood in a year, and have a TIC greater or equal to 1MW, must have an audited annual report compiled.
- 5.4. Evidence provided must be assessed by a third party verifier/auditor as ‘adequate’ for each of the ten sustainability principles (S1-S10 in the Timber Standard). If it is determined at the end of the year that the evidence supporting consignments reported to Ofgem is ‘not adequate’, then sanctions and penalties may be applied in line with Ofgem procedures.
- 5.5. For biomass suppliers on the BSL, assessment of compliance with the woodfuel land criteria will be assessed by the List Administrator. If the List Administrator considers the assessment of risk and evidence provided by suppliers as ‘not adequate’, then sanctions and penalties may be applied in line with Applications and Audit Guidance document. See : <http://biomass-suppliers-list.service.gov.uk/docs/default-source/default-document-library/applications-and-audit-guidance-v1-3.pdf?sfvrsn=0>.
- 5.6. The Risk-Based Regional Assessment: a Checklist Approach document has been designed to advise generators and their third party verifiers/auditors what Timber Standard Category B evidence might be accepted as part of a risk-based regional approach. That document can be found on this [web page](#).

## 6. Special cases

This section sets out what material is exempt from compliance with the Timber Standard such as waste material and bioliquids. Exempt material cannot be included in Mass Balance calculations and has to be treated separately. The section further clarifies requirements for material that is “deemed sustainable” and can be included in Mass Balance calculations. It also lays out if and how other biomass such as energy crops have to comply with Timber Standard requirements and clarifies the status of FLEGT timber.

- Waste material
- Energy Crops
- FLEGT
- Deemed sustainable (included but sustainable)
- Other biomass
- Bioliquids

### Waste material

- 6.1. Woodfuel which is classified as 'waste' or post-consumer recycled material does not need to meet the woodfuel land criteria as set out in the Timber Standard. This material cannot be included in the Mass Balance calculations and does not need to comply with the 70/30 threshold. Information and guidance about how waste and post-consumer recycled material is defined can be found [here](#). However, pre consumer recycled materials such as sawdust must comply with the woodfuel land criteria.
- 6.2. **Please note that waste material still needs to comply with EU Timber Regulation (EUTR) legality requirements.**

### Energy Crops

- 6.3. Energy crops are as defined in the RO and RHI Orders. A [government consultation document](#) sets out what an energy crop is. Energy crops do not have to comply with the Timber Standard (from when the amended 2015 RO and RHI come into force), but may need to comply with the RED land criteria. More information about energy crops can be found [here](#).

### FLEGT

- 6.4. FLEGT stands for Forest Law Enforcement, Governance and Trade. The EU's FLEGT Action Plan was established in 2003. It aims to reduce illegal logging by strengthening sustainable and legal forest management, improving governance and promoting trade in legally produced timber. Woodfuel sourced from a FLEGT<sup>19</sup> partner country will be

---

<sup>19</sup> The Forest Law Enforcement, Governance and Trade Action Plan (FLEGT) is the European Union's response to the problem of illegal logging and trade in associated timber products. A key part of the FLEGT Action Plan is the negotiation of bilateral Voluntary Partnership Agreements (VPAs) between the European Union and timber-

accepted as legal, but it will not be considered as sustainable. More information about FLEGT can be found [here](#).

## Deemed Sustainable

- 6.5. Arboricultural residues and material removed for ecological reasons where it originates from non-forest land are deemed (from when the CfD and 2015 amended RO and RHI come into force) to have come from a sustainable source under the Timber Standard for the RO, CfD and RHI, as set out in the [August 2014 government response](#). When claiming ROCs or RHI, material 'deemed sustainable' does not need to provide evidence that it comes from a sustainable source as defined by the Timber Standard (criteria S1-S10). However, where a generator, RHI participant or biomass supplier seeks to use either arboricultural residues or material removed for ecological reasons originating from non-forest land, they have to show evidence that the material complies with the definition of arboricultural residues or material removed for ecological reasons originating from non-forest land, respectively. Generators and installations will also have to ensure the material complies with EUTR legality requirements. The material will then be 'deemed sustainable' and will be able to count towards the 'legal and sustainable' proportion of woodfuel under the Timber Standard Mass Balance calculations. Users of this material will still have to demonstrate that it complies with the relevant greenhouse gas emissions criteria under the RO and RHI.
- 6.6. As set out in the [August 2014 government response](#), arboricultural residues are considered as material from woody plants and trees planted for landscape or amenity value that are removed as part of tree surgery usually in gardens, parks or other populated settings, and utility arboriculture such as the verges of roads and railways. Ofgem may provide further guidance on this.
- 6.7. Material removed for ecological reasons originating from non-forest land is considered in contradiction to forest land which the UK Forestry Standard defines as "land predominately covered in trees (defined as land under stands of trees with a canopy cover of at least 20%), whether in large tracts (generally called forests) or smaller areas known by a variety of terms (including woods, copses, spinneys or shelterbelts)". Where trees are cleared for ecological reasons originating from forest land they are not 'deemed sustainable' and have to meet the Timber Standard as part of the normal arrangements for forest management.

## Bioliqids

- 6.8. Bioliqids do not have to comply with the woodfuel land criteria. However, bioliqids must comply with the GHG criteria and their own land criteria. See Ofgem guidance [here](#).

## Other Biomass

- 6.9. Virgin wood, or wood made from virgin wood, falls into the categories of product, co-product, forestry residue and processing residue.

---

producing countries. Under the terms of a VPA a country agrees with the EU to implement a timber licensing system. From that country, the EU will only accept licensed products, and unlicensed products will be refused customs clearance with the aim of preventing illegal products from entering the EU market.

6.10. The table below clarifies if and how other biomass material must comply with the Timber Standard. ‘Residues from agriculture’ and ‘residues from aquaculture and fisheries’ have their own land criteria to comply with (see Ofgem Guidance) and have been excluded from the table.

	<b>Woodfuel land criteria</b>	<b>GHG criteria</b>
Waste <sup>20</sup> , including waste wood	Exempt	Exempt
Biomass wholly derived from waste	Exempt	Exempt
Processing residues	If not wood - exempt from woodfuel land criteria. If wood – must report and comply with woodfuel land criteria	Emissions during and from the process of collection only
Residues from forestry	Must report and comply with woodfuel land criteria	Emissions during and from the process of collection only
Residues from arboriculture	Deemed sustainable <sup>21</sup>	Emissions during and from the process of collection only
Products, co-products	Must report and comply with woodfuel land criteria	Emissions during and from the process of collection only

<sup>20</sup> “Waste” has the meaning given to it in section 75(2) of the Environmental Protection Act 1990([1]) but does not include gas derived from landfill sites or gas produced from the treatment of sewage.

<https://www.ofgem.gov.uk/publications-and-updates/renewables-obligation-sustainability-criteria-guidance-0>

<sup>21</sup> From 2015 when RO/RHI come into force. Applies from April for CfD holders.

## 7. How does the Timber Standard compare to the Timber Procurement Policy?

- 7.1. All timber and timber products (including woodfuel) supplied to central government departments, their executive agencies, executive non-departmental public bodies, and non-ministerial government departments in England must comply with the UK-TPP. The wider public sector is also strongly encouraged to comply.
- 7.2. The principles used in the Timber Standard are based on the same set of principles as the UK-TPP, though there is a key difference: the UK-TPP Category B approach does not permit a risk-based regional approach. The UK-TPP requires traceability of each piece of timber back to a forest management unit, whereas the Timber Standard allows a risk-based regional approach that requires traceability back to the supply base, where there is low risk of non-compliance with the woodfuel land criteria as set out in the Timber Standard.
- 7.3. **As a result, wood complying with the UK-TPP automatically complies with the Timber Standard. However wood complying with the Timber Standard does not necessarily comply with the UK-TPP.** The only exception where compliance with the UK-TPP does not ensure compliance with the Timber Standard is FLEGT timber. At the time of publication FLEGT timber is acceptable under the UK-TPP as 'legal and sustainable'. Under the Timber Standard, FLEGT timber is considered 'legal only'. See paragraph 6.4.

## 8. Where can I get more help?

- 8.1. [Timber Standard for Heat & Electricity](#): This document sets out how the land criteria will apply to the use of woodfuel under the Renewable Heat Incentive and Renewables Obligation. Much of the Timber Standard is being transposed into the Orders and regulations for the RO and RHI.
- 8.2. [Timber Standard Mass Balance and Consignment guidance](#): This document provides guidance on implementing the Mass Balance approach and clarification on the concept of 'consignment' in order to comply with Timber Standard requirements.
- 8.3. [Checklist for Regional Supply Base Evaluation](#): The checklist for regional supply base evaluation helps woodfuel buyers and suppliers provide evidence for compliance with the woodfuel land criteria without the use of certification.
- 8.4. **Central Point of Expertise on Timber (CPET)** offer a helpline service providing information and guidance to suppliers and generators of woodfuel on how they can comply with the woodfuel land criteria as set out in the Timber Standard. CPET also provides information and guidance on how to provide Timber Standard Category A and Timber Standard Category B bespoke evidence. For woodfuel generators and suppliers who have to comply with the UK-TPP, CPET provides information and guidance on compliance.

Please note that CPET **cannot** provide technical advice on woodfuel queries (ie moisture content, weight, volume, size etc.) or provide guidance on how to get listed on the BSL. CPET also cannot provide advice on how to apply for RO or RHI schemes, determine a consignment, get incentives or comply with GHG criteria.

Web: [www.gov.uk/government/groups/central-point-of-expertise-on-timber](http://www.gov.uk/government/groups/central-point-of-expertise-on-timber)

Email: [cpet@efeca.com](mailto:cpet@efeca.com)

Tel: +44 (0)1305 236 100 (Mon-Fri 9am – 5pm)

- 8.5. **The BSL Helpdesk** provides advice and support regarding the authorisation process to the Biomass Suppliers List. It also provides guidance and information about the following:
  - How to comply with meeting the GHG criteria
  - Defining if you are a producer, trader, producer-trader or self-supplier and what your requirements are
  - Requirements applicable to BSL mark branding guidelines
  - Technical queries on woodfuel from suppliers of BSL registered fuel (ie moisture content, size, weight, nature of raw material/fuel, measuring volumes of raw material/fuel)

Please note that the BSL Helpdesk **cannot** provide information and advice about application processes for incentive schemes or policy and legislation queries.

Web: <http://biomass-suppliers-list.service.gov.uk/contact-us>

Email: [bslhelpdesk@gemserv.com](mailto:bslhelpdesk@gemserv.com)

Tel: +44 (0)20 7090 7769 (Mon-Fri 9am – 5pm)

Further information on the BSL can be found [here](#).

- 8.6. **Ofgem** can help answer enquiries regarding the RO scheme and RHI (Domestic and Non-Domestic) application processes. Ofgem also provides advice on enquiries regarding fuel classification. Queries in relation to the B2C2 calculator software should be directed to the following email: [b2c2support@e4tech.com](mailto:b2c2support@e4tech.com).

Web: [www.ofgem.gov.uk](http://www.ofgem.gov.uk)

**For Renewables Obligation (RO):**

Email: [renewable@ofgem.gov.uk](mailto:renewable@ofgem.gov.uk)

Tel: 020 7901 7310

**For Domestic RHI Applicants:**

Email: [domesticRHI@ofgem.gov.uk](mailto:domesticRHI@ofgem.gov.uk)

Tel: 0300 003 0744 (Mon to Fri 8am to 7pm)

**For Non-Domestic RHI Applicants:**

Email: [rhi.enquiry@ofgem.gov.uk](mailto:rhi.enquiry@ofgem.gov.uk)

Tel: 0845 200 2122 (Mon to Thurs 9am-5pm, and Fri 9am-4.30pm)

**For CfD**

Web <https://lowcarboncontracts.uk/contact-us>

- 8.7. The [Forestry Commission](#) provides information on management plans, felling licences and sustainable forest management practices. The [UK Forestry Standard \(UKFS\)](#) is the reference standard for sustainable forest management in the UK. The UKFS, supported by its series of Guidelines, outlines the context for forestry in the UK, sets out the approach of the UK governments to sustainable forest management, defines standards and requirements, and provides a basis for regulation and monitoring.
- 8.8. The National Measurement Office (NMO) answers enquiries related to compliance with the [EU Timber Regulation \(EUTR\)](#). Click [here](#) for the official NMO Enforcement enquiry form.
- 8.9. This is a guidance document only. The onus is on generators and participants to ensure that they are aware of, and are complying with, the requirements of the Orders, Regulations and CfD as the case may be. This guidance is not intended to provide comprehensive legal advice on how the Orders, Regulations and CfD should be interpreted. Where necessary, generators and participants should seek their own technical or legal support.

## 9. Glossary

Approved schemes	Independent certification schemes recognised by the UK Government as meeting the criteria set out in the Timber Standard
Arboricultural residues	Material from woody plants and trees planted for landscape or amenity value that are removed as part of tree surgery usually in gardens, parks or other populated settings, and the verges of roads and railways
Biomass Suppliers List (BSL)	List of suppliers of woodfuel who have been accredited as demonstrating that their fuel meets the sustainability criteria required under the RHI.
Chain of custody (CoC)	The ability to trace a product from its point of origin through the supply chain to the end product
Consignment	<p>Ofgem have set out <a href="#">guidance</a> on what constitutes a consignment. Each consignment should constitute the <i>same</i> characteristics in terms of:</p> <ul style="list-style-type: none"><li>• Feedstock type<sup>22</sup></li><li>• Biomass form (solid biomass only)</li><li>• Country of origin<sup>23</sup></li><li>• Classification of the fuel (residue, product etc.)</li><li>• Compliance with sustainable forest management criteria</li></ul> <p>Compliance with GHG criteria</p>
Controlled	Material certified as either FSC Controlled Wood or PEFC Controlled Sources
CPET	Central Point of Expertise on Timber
DNC	Declared Net Capacity
EU Timber Regulation No 995/2010 (EUTR)	European Union legislation prohibiting the placement for the first time of illegally harvested timber or their products on European markets.

---

<sup>22</sup> This is to ensure that different biomass fuels are not grouped together, e.g. wood cannot be considered the same as sunflower pellets or rapeseed oil cannot be considered the same as used cooking oil.

<sup>23</sup> UK considered as a single country of origin

FLEGT	Forest Law Enforcement, Governance and Trade; The EU's FLEGT Action Plan was established in 2003 and aims to reduce illegal logging by strengthening sustainable and legal forest management, improving governance and promoting trade in legally produced timber.
FSC	Forest Stewardship Council; is a voluntary, international forest certification scheme who sets standards for sustainable forest management
Generator	UK electricity power producer operating under the RO and RHI
ISAE 3000	International Standard on Assurance Engagements performance assessment scheme
Land criteria	for solid biomass, also known as “woodfuel” – The woodfuel land criteria requires compliance with the Timber Standard for Heat & Electricity, sustainable source definition (Principles S1 – S10), including compliance with the 70/30 threshold
Legal Source	Woodfuel which is in conformance to EU Timber Regulation No. 995/2010
‘Legal only’	Woodfuel originating from a legal source
List Administrator	Oversees the BSL and assesses compliance of fuels listed
MBA	Mass Balance Approach - a system which requires that, at each step in the chain, parties can only use/sell biomass with the same sustainability characteristics and in the same volume as the biomass they took in originally, less any biomass they have recorded as being used or sold previously.
Material removed for ecological reasons from non-forest land	Where trees are removed for ecological reasons on non-forest land for example, to restore heathlands, moorland, unimproved grasslands, bog or wetlands etc. by removing small trees or shrubs that are encroaching
Office of Gas and Electricity Markets (OfGEM)	A non-ministerial government department and an independent National Regulatory Authority that regulates the gas and electricity markets in Great Britain.
PEFC	Programme for the Endorsement of Forest Certification; is a voluntary international forest certification scheme who sets standards for sustainable forest management
RHI	Renewable Heat Incentive
RO	Renewable Obligation
ROC	Renewable Obligation Certificate
Self-supplier	Participants can be defined as a self-supplier if their installation

	is less than 1MW capacity and if they source woodfuel (which they have the legal right to source, through ownership, rental or other relevant arrangement) from the same Estate as the boiler
Supplier	Entity which supplies woodfuel to the generator
Supply Base	The area from which raw material and woodfuel originates
Sustainable Forest Management	Forest management practices, independently verified in conformance to Timber Standard Category A or Category B Bespoke Evidence
Sustainable source	Originates from a forest which is managed in accordance with a definition of sustainable that meets the requirements S1-S10 in the Timber Standard
Threshold, 70/30	Generators and suppliers must ensure that <b>all</b> their woodfuel (by volume, calorific value or oven dried equivalent weight) supplied under the RO and RHI is legal and that at least 70% of all woodfuel meets the definition of 'legal and sustainable'. See also sustainable source and legal source.
TIC	Total Installed Capacity
Traceability	See Chain of Custody
Timber Standard	Timber Standard for Heat and Electricity
Timber Standard Category A (Timber Standard Category A) evidence	Evidence provided by approved schemes that Timber Standard sustainability and legality criteria are complied with (see 'approved schemes')
Timber Standard Category B (Timber Standard Category B) bespoke evidence	All forms of credible evidence other than certification schemes that indicate compliance with the Timber Standard sustainability and legality criteria
UK-TPP	United Kingdom Timber Procurement Policy
Virgin Wood	Wood and other products such as bark and sawdust which have had no chemical treatments or finishes applied
Waste	"Waste" has the meaning given to it in section 75(2) of the Environmental Protection Act 1990([1]) but does not include gas derived from landfill sites or gas produced from the treatment of sewage. <a href="https://www.ofgem.gov.uk/publications-and-updates/renewables-obligation-sustainability-criteria-guidance-0">https://www.ofgem.gov.uk/publications-and-updates/renewables-obligation-sustainability-criteria-guidance-0</a>
Woodfuel	Solid fuel that is wood or derived from wood which has not been previously used for some other purpose; e.g. recycled construction material, wood pallets, wood decking
Woodfuel land criteria	The Timber Standard for Heat & Electricity, Principles S1 – S10, compliance with the 70/30 threshold (see 70/30 threshold);



© Crown copyright 2014  
Department of Energy & Climate Change  
3 Whitehall Place  
London SW1A 2AW  
[www.gov.uk/decc](http://www.gov.uk/decc)  
URN 14D/482