

Multi Site inspection and pricing for HETAS Quality Assured Fuel

This paper declares when a producer will need to have more than one processing site inspected. This defines the basis for pricing for both application and renewal. Worked examples are included.

Background

The Site Inspection part of the scheme needs to inspect as many of a producer's sites as is necessary to provide confidence in all their assured product. The pricing for applications and renewals needs to reflect the costs for site inspections and scheme maintenance.

The scheme needs to have a policy for all applicants, so that the scheme can be seen to be fair and costing structures can be made available to potential applicants in advance of their decision to apply.

There is a wide variety of producer site scenarios from merely an outlying storage depot to a duplicate processing site. Between the four fuels of Briquettes, Firewood, Chips and Pellets there are different issues to be managed. The risk to product quality deviation is different for each case. However, there are definitive aspects that the scheme needs to audit with a site inspection and these can be listed to define whether a site inspection is required at the secondary locations.

Scheme policy

1. Inspect the HQ site and additional sites according to rules as listed below
2. Additional sites may be monitored on a 'as convenient/ when passing' basis (no charge)
3. Where there are 'reasonable' similarities between sites seen at application assessment, then fewer sites might need to be visited for yearly registration (HETAS will decide)
4. These principles are to be used as the basis in all cases, with some flexibility for individual cases.
5. HETAS may increase the number of assessed sites (with year's fee) as a result of substantiated complaints. Note that if a processor has batching records through to customer delivery, then they can limit the number of sites that might need to be assessed following a complaint.
6. HETAS may use remote assessment of secondary sites as appropriate.

Rules for when more than one site inspection is required

– the following aspects need to be site audited, whether they are at one site or many:

- Any processing site that produces more than 4000 tonnes will be inspected as part of registration even if it is a replica of another site.
- The whole processing chain for each fuel type (briquette, firewood, chip, pellet)

- The whole processing chain starts from receipt of raw material and goes through to goods packed for delivery to consumer
- 'Packed' here means measured into the pack size for customer sale
- For each fuel grade any process variance needs to be seen and finished product needs to be seen in store
 - Fuel grade includes 8mm vs 6mm pellet, P31.5 vs P16B chip, kiln dried vs air dried firewood
- The packing process to each pack size must be seen
 - E.g. net of logs vs 1m³ pack
- All measurement tooling that keeps the process in control must be seen
 - E.g. Mobile moisture meter, in-house lab testing facilities,
- The processing site for different types of feedstocks need to be seen
 - E.g. slab wood vs roundwood for chip, whole tree vs saw dust for pellet
- If there are significant (not yet defined) differences between the process controls declared for different sites, then examples of each process control needs to be seen

Remote assessment of secondary sites

HETAS may request any of the following to provide confidence that 'non-visited' sites have suitable controls in place:

1. Record sheets recording process control data for production product
2. Photographs of other sites and their storage
3. Staffing list and training records

Worked examples

A chip processor has 10 sites, all the machinery is based at HQ with a test lab. P31.5 and P16B chip is produced, but the HQ site only has the P31.5 product. The process is the same at all sites where the same type of feedstock is used. Two sites need to be assessed, the HQ site and one of the others that produces P16B chip. After two years, there is enough confidence in the similarity of process and controls to reduce to just visiting the HQ site.

A pellet processor has two large volume processing sites and 20 distribution depots. Three sites need to be visited each year, the two processing sites and the one (a different one each year) distribution depot.

A firewood processor cuts and dries at one site, bags the product at a second site and has 20 distribution depots. Two sites need to be visited every year, the processing site and the packing site. This assumes that once packed there is minimal risk to the product quality or quantity in the remainder of the supply chain.

A briquette processor bags 20kg bags at the HQ site which also has the test lab and has a second very similar site that also delivers bulk bags to consumers. For the application, both sites are assessed. But for yearly registration, only the HQ site is assessed, with signed daily record sheets showing the process recording for the second site.