

Sustainability Criteria for Biomass Fuel – proposal from HETAS

Background

HETAS are running a third party assurance scheme for biomass fuel producers using the CEN 14961 standard. We want assured producers to use sustainable feedstock, so all product with the HETAS solid biomass assurance scheme logo can be recognised as a quality fuel from a sustainable source. So we need a sustainability standard for biomass feedstock that is nationally respected and is pragmatic in application. We need the application of the standard to be appropriate to the risk and easy enough to apply for all sizes of operative in the supply chain.

The risk that must be avoided is that lots of small volume product flow that is very sustainable is closed down in preference for volume product flow that is less sustainable.

Current activities (that should regard as sustainable, low risk) that are vulnerable to new legislation:

- **Tree surgery by-product** that often goes to land fill, but can and does make up a useful proportion of wood chip heating fuel (possibly 20%). The sourcing of this is often informal with a multitude of suppliers making many small load deliveries. Detailed sustainability documentation for each load could easily kill this source.
- **Slab wood by-product**, where the source roundwood may have no 'sustainability' assurance - again this can and does make up a useful proportion of wood chip heating fuel (possibly 20%)
- **Self supply of biomass** - what could be more sustainable than using timber from your own land to fuel your own boiler
- **Small scale log suppliers** - will generally be using local sources for local deliveries and helping local community sustainability. It would be nice to know what proportion of log supplies are delivered by the smaller (less than 500 tonnes per year) producer. At this small scale, the profit per year cannot justify a heavy paper-work load and expensive, compulsory assurance schemes.

Trade that should be regarded as high risk needing robust controls (partly to satisfy public concerns):

- Imported roundwood that has no recognised third party assurance (FSC or ...)
- Imported processed biomass

I believe that there are enough felling controls for UK sourced wood (some may advise otherwise), so as long as there is supply chain assurance for UK sourcing, I would not want to add further paper-work for UK sourcing. If additional controls are required it should be restricted to large feedstock sourcing contracts. Additional controls should not be added at later parts of the supply chain as this still kills off the trade of biomass sourced from a multitude of small sustainable sources.

A new issue that is arising in the biomass trade is the drying of biomass using fuel. The use of biomass fuel (usually low grade by-product material) to provide this process heat will provide minimal change to the carbon neutral status of the biomass end product. However, the use of fossil fuel to provide this process heat could have a significant impact on the carbon neutral status. Green House Gas (GHG) Balance calculations will be required to assess the acceptability of this type of processing relative to current and future targets.

Proposals

- Exclude by-products from needing any sustainability paper-work, to include tree surgery by-product.
- UK sourced timber where there is an assurance that it is UK grown, to be regarded as sustainable.
- Small scale suppliers (e.g. less than 1000 tonnes per year) not to be required to be bound by sustainability legislation
- Small scale providers only need to provide evidence of 60% of output volume being felled within 100 miles to be regarded as sustainable, without needing to show more rigorous paper work.
- Investigate the GHG balance for biomass fuels that use fossil fuel for process heat

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www.hetas.co.uk/public/Solid_Biomass_Assurance_Scheme.html

