



Consultation

Northern Ireland Renewables Obligation Consultation on adjustments to sustainability and reporting provisions for biomass

**Statutory Consultation for the Renewables Obligation Order (Northern
Ireland) 2015**

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INTRODUCTION

1

Purpose of the consultation

- 1.1 This consultation sets out proposals by the Department of Enterprise, Trade and Investment (the Department) on further proposals related to biomass sustainability reporting.

Adjustments to biomass reporting provisions

- 1.2 Following consultation in 2012, DETI, in line with the rest of the UK, decided to make sustainability criteria mandatory for support under the NIRO from April 2015, for stations of 1 megawatt (MW) and above that use solid biomass or biogas. Both the Department of Energy and Climate Change (DECC) and DETI held further supplementary consultations on biomass sustainability and affordability during 2012/2013.¹ In June 2014 DECC launched an additional short consultation on adjustments to sustainability and reporting provisions for biomass². This consultation closed on 14 July 2014 and a Government Response was published on 12 August 2014.³ The Scottish Government published a consultation on 13 August 2014 based on DECC's consultation response.⁴
- 1.3 Northern Ireland has previously remained consistent with the rest of the United Kingdom in relation to biomass sustainability matters and we are not aware of any Northern Ireland specific reasons for adopting a different policy stance to DECC. However, it is expected that this consultation process will either confirm this view or produce evidence-based rationale for a different approach, where necessary.
- 1.4 This consultation seeks views on five proposed adjustments to sustainability and reporting provisions for biomass.

¹ http://www.detini.gov.uk/niro_2012_consultation_on_solar_pv_and_biomass.pdf

² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/320567/biomass_sustainability_consultation.pdf

³ <https://www.gov.uk/government/consultations/biomass-sustainability>

⁴ <http://www.scotland.gov.uk/Topics/Business-Industry/Energy/Obligation-12-13/BiomassConsult2014>

Consultation Process

1.5 The 4 week consultation closes for responses on **11 November 2014**.

Implementation

1.6 The proposed changes on adjustments to sustainability and reporting provisions for biomass will come into operation on 1 April 2015. Changes will be made through a consolidated Renewables Obligation Order (Northern Ireland) 2015 and is contingent on obtaining approval of the Northern Ireland Assembly.

How to respond to this consultation

1.7 Responses to this consultation should reach DETI on or before **11 November 2014** and should be sent, preferably by e-mail, to:

NIRO2015@detini.gov.uk

or by post to:

**Renewable Electricity Branch
Department of Enterprise, Trade and Investment
Netherleigh
Massey Avenue
BELFAST
BT4 2JP**

All responses should include the name and postal address of the respondent.

Confidentiality & Data Protection

1.8 Your response may be made public by DETI and placed on the DETI website as part of the consultation process. If you do not want all or part of your response or name made public, please state this clearly in the response by marking your response as 'CONFIDENTIAL'. Any confidentiality disclaimer that may be generated by your organisation's IT system or included as a general statement in your fax cover sheet will be taken to apply only to information in your response for which confidentiality has been specifically requested.

1.9 Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 1998 (DPA)). If you want other information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

1.10 In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

Copies of the Consultation

1.11 This Consultation document is being produced primarily in electronic form and may be accessed on the DETI Energy website: www.energy.detini.gov.uk or may be obtained from the address above or by telephoning 028 9052 9240.

1.12 If you require access to this Statutory Consultation document in a different format – eg Braille, disk, audio cassette, larger font – or in a minority ethnic language please contact the Department on 028 9052 9240 and appropriate arrangements will be made as soon as possible.

ADJUSTMENTS TO SUSTAINABILITY AND REPORTING PROVISIONS FOR BIOMASS

2

Background

- 2.1 Biomass fuels used for electricity generation come from a range of sources and locations, including forestry management, sawmill residues, perennial energy crops, agricultural residues such as straw, and wastes such as sewage. Imports from the EU, North America and potentially developing countries will play an important part alongside expanding home-grown supplies (wood, straw, animal wastes, etc.). The majority of the biomass used for UK electricity generation is expected to be imported.
- 2.2 Reporting requirements on the use of biomass under the Northern Ireland Renewables Obligation (NIRO) were introduced in 2009¹. The Renewable Energy Directive brought in mandatory sustainability criteria for bioliquids, which were incorporated into the NIRO in 2011². At the same time, the reporting requirements for solid biomass and biogas were expanded to require reporting against greenhouse gas (GHG) emissions criteria and land criteria, largely based on the sustainability criteria for bioliquids. These required generators to report whether the biomass they had used had been sourced from a type of 'protected land' and to provide details of the GHG emissions associated with its production and use.
- 2.3 Following consultation in 2012, DETI, in line with the other two ROs, decided to make the sustainability criteria mandatory for support under the NIRO from April 2015, for stations of 1 MW and above that use solid biomass or biogas. DETI's response³, published in October 2013, made some further changes to the sustainability criteria and reporting requirements for solid biomass and biogas. Full details are set out in our October 2013 government response.

¹ <http://www.legislation.gov.uk/nisr/2009/154/contents/made>

² <http://www.legislation.gov.uk/nisr/2011/169/contents/made>

³ http://www.detini.gov.uk/government_response_to_biomass_sustainability_consultation.pdf?rev=0

- 2.4 In June 2014, DECC launched an additional consultation seeking views on five proposed adjustments to the biomass sustainability and reporting provisions for biomass¹. DECC's consultation closed on 11 July 2014 and a government response issued on 12 August 2014. The Scottish Government published its consultation on 13 August 2014 based on DECC's consultation response. DETI is not aware of any Northern Ireland specific reasons to adopt a different position to GB and the relevant proposals contained in this chapter are broadly in line with those published in DECC's consultation and subsequent response of August 2014.

Northern Ireland Renewable Heat Incentive (RHI)

- 2.5 The DECC and Scottish Government consultations make proposals related to biomass sustainability in the Renewable Heat Incentive. These are excluded from the Northern Ireland consultation. Whilst the final policy has yet to be agreed, biomass sustainability measures under the Northern Ireland RHI are likely to be comparable to provisions under the Renewables Obligation (RO).

Summary of proposals

Proposal 1 – To revise the 'Saw Logs' definition in the NIRO

- 2.6 Saw logs are the higher quality parts of trees which can be used for furniture and other valuable uses. It is undesirable, in climate change and economic terms, to use saw logs for energy. Generators over 50kW are therefore required to report under the RO on the amount of saw logs they use for electricity generation, although this has no impact on support received.
- 2.7 The current saw logs definition (which was included in the Renewables Obligation (Amendment) Order (Northern Ireland) 2014²) is based on tree age (the trunk of trees of 10 years and over). The majority of respondents to DECC's consultation agreed that the current definition of saw logs is likely to result in inaccurate reporting as in practice it will be the form of tree, local geography and climate, growth rates and local sawmill markets that will determine what is suitable quality for sawing.
- 2.8 In the feedback to DECC, there was a general consensus that there is no single workable definition that is likely to be able to capture all of these variables and that, as such, a definition that is clear but flexible enough to reflect local sawmill practices should be used. In line with DECC, **DETI therefore proposes to replace the current definition of saw logs in The Renewables Obligation (Amendment) Order (Northern Ireland) 2014 with a requirement for generators to use a definition for saw logs which matches the local specifications for saw logs in operation where the wood originates.** This would mean that generators would be required to report against the definition of saw logs which matches the local specifications for saw logs

¹

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/320567/biomass_sustainability_consultation.pdf

² <http://www.legislation.gov.uk/nisr/2014/146/contents/made>

in place where the sawmill operates and to reference details of the local specification used.

- 2.9 In DECC's consultation it was proposed that these specifications could, for example, be published standards – such as the Forestry Commission Field Book definition of 'green saw logs' as described in Table 1¹ of the Field Book - the definitions of saw logs used in national reporting, or the size and quality requirements specified by local saw/lumber mills. If the wood meets the local specification, it is a saw log and should be reported as such in the profiling data report. Generators would need to provide details of the local or national specification that had been used.
- 2.10 In its response issued in August, DECC confirmed that where details of relevant local specifications are not available, generators should report against the UK specifications set out in Table 1 of the 'Forestry Commission Field Book 9 – Classification and Presentation of Soft Saw logs'. Therefore, in line with DECC, **if details of local or national specifications are not available, DETI proposes that generators could, as a default option, report against the local UK specifications set out in the Forestry Commission Field Book.**
- 2.11 This should ensure that the data being collected more closely matches the type and quality of timber actually being used by saw mills in the UK and overseas to produce quality products. This should prevent the under or over reporting of saw logs use for energy.

Proposal 2 - To reconsider the reporting requirements for tree species in the NIRO

- 2.12 The Renewables Obligation (Amendment) Order (Northern Ireland) 2014, together with the other two ROs, introduced the requirement for generators to report on the species of wood they use for energy generation. This requirement provides information on the type of wood being used (and imported) for energy generation. This reporting provision was included to enable the monitoring of the types of trees that are being used for energy and whether any endangered or declining species are being used. Another potentially relevant requirement exists under the EU Timber Regulation² which requires operators who place timber or timber products on the internal market for the first time to use a due diligence system which includes the common name of tree species and, where applicable, its full scientific name.
- 2.13 Respondents to DECC's consultation confirmed that it can be difficult in practice for generators to report on the tree species (i.e. the full scientific name) for wood that has originated from several areas of mixed woodland and for non waste residues such as saw mill residues. Therefore, based on the positive responses to the DECC consultation and DECC's final policy decision, **DETI proposes to make this reporting requirement more workable, by replacing the 'tree species' reporting requirement**

¹ The Forestry Commission Field Book 9 Classification & Presentation of soft wood saw logs 2nd Edition 1993 contains a detailed definition for green saw logs in Table 1 which includes "minimum length is 3 m with minimum top diameter of 16cm" A copy of the Field Book can be viewed on the DECC website at: <https://econsultation.decc.gov.uk/decc-policy/biomass-sustainability>

² Regulation (EU) No 995/2010 of the European Parliament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market.

with a requirement for generators to report on the proportion of wood used which is 'hardwood' and the proportion which is 'softwood'. We also propose to include a requirement for generators to report on whether any of the wood used was likely to have come from protected or threatened species (and if so, to name that species). This will simplify the administration of this reporting provision but taken with the other required wood profiling information will still provide us with useful information about the wood being used for bioenergy.

- 2.14 Hardwood will be defined as deriving from a broadleaf tree and softwood from a coniferous tree. The list of protected/threatened species would be based on the Convention on International Trade in Endangered Species¹ (CITES) Appendices and on The International Union for Conservation of Nature² (IUCN) 'Red List of threatened species'.
- 2.15 These definitions and inventories are publicly available and widely understood by the sector. Given the usual distinct physical properties of hard and soft wood it should, in practice, be more straightforward for generators and the supply chain to identify these types of wood in individual consignments of wood and residues.
- 2.16 It is anticipated that the proposed changes to the reporting of tree species under the NIRO may help reduce the administrative burden on industry while at the same time increasing the value of the reported information.

Proposal 3 – To provide exemptions from the Timber Standard for certain categories of wood for the NIRO

- 2.17 In October 2013 and consistent with the other two ROs, DETI announced its decision to bring in sustainable forest management criteria under the NIRO for the use of solid biomass or biogas that is, or is made from, wood³.
- 2.18 The sustainable forest management criteria are set out in DECC's Timber Standard for Heat and Electricity, (the 'Timber Standard'⁴) published in February 2014. This draws on the principles set under the UK Government Timber Procurement Policy (UK-TPP) and 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. In practice, to meet the Timber Standard criteria, wood must either be sourced from a recognised forest certification scheme (this is known as Category A evidence under the UK-TPP) or provide bespoke evidence to demonstrate that it has been sustainably sourced (known as Category B evidence under the UK-TPP).
- 2.19 The Central Point of Expertise for Timber procurement by the public sector (CPET) provides information on its website⁵ on Category A and B evidence under the UK-

¹ CITES Appendices 1, II and III for flora - <http://www.cites.org/eng/app/appendices.php>

² See ICUN Red List of threatened species at: <http://www.iucnredlist.org/about/introduction>

³ http://www.deti.gov.uk/government_response_to_biomass_sustainability_consultation.pdf?rev=0

⁴ Timber Standard for Heat and Electricity (February 2014) -

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/278372/Timber_Standard_for_Heat_and_Electricity_under_RO_and_RHI_-_10-Feb-2014_for_pdf_-_FINAL_in_new_format.pdf

⁵ www.cpet.org.uk

TPP. CPET have developed a Framework to provide support to both purchasers and suppliers on the provision and assessment of bespoke evidence with respect to the UK-TPP for Government. CPET is currently developing advice notes¹ to support the Timber Standard implementation and expect to publish these in the autumn.

2.20 The Timber Standard does not apply to waste wood or to wood used to make bioliquids. The Timber Standard applies to all other biomass that is wood or derived from wood, even if the wood did not come from a forest. From June 2014, generating stations over 50kW have been required to report against the Timber Standard under the NIRO. From April 2015, it is intended to make compliance with the Timber Standard mandatory for stations of 1MW and above in order to receive ROCs.

2.21 In its consultation of June 2014, DECC proposed providing exemptions from the Timber Standard for residues from arboriculture, diseased wood, and trees being removed from areas which are being restored for ecological reasons. This was based on feedback from industry which indicated that compliance with the Timber Standard would be very difficult for these types of woody materials, without significant bureaucracy and it was suggested that failure to exempt this material could lead to it being disposed of in an unsustainable manner, either by burning in situ without energy recovery or sent to landfill.

- (i) **Residues from arboriculture.** In DECC's Government Response published in August 2014, it was confirmed that arboricultural arisings would be exempted from the sustainability requirements of the Timber Standard for the RO. Arboricultural arisings comprise/will be defined as material that is removed as part of tree surgery, management of municipal parks and verges of roads and railways.

DECC have confirmed that where industry seek to rely on these exemptions under the RO, it will be for the biomass supplier or generator operator to provide Ofgem with evidence verified as part of the annual sustainability audit reports which allows the regulators to determine that the relevant exemption has been met. Operators can discuss with Ofgem the type of evidence which they would consider acceptable for verification, bearing in mind that it will be a legal requirement under the European Timber Regulation (EUTR) to collect information about the origin of such material.

- (ii) **Diseased wood** for example trees removed under Statutory Plant Health Notices. In its Government Response, DECC confirmed that following further analysis and discussion with technical experts at the Forestry Commission regarding UK and international sustainable forest management and disease control policies, it had identified potential serious unintended consequences of the proposed exemptions on wider forest management practices. Diseased trees are therefore not exempt from the Timber Standard.

¹ CPET intends to produce 3 advice notes to support the Timber Standard: Woodfuel Bioenergy and Sustainable Forest Management Advice Note; Checklist for Regional Supply Base Evaluation; Mass Balance Guidance for non-certified woodfuel.

- (iii) **Trees being removed from areas for ecological reasons** (for example to restore grassland/wetlands). DECC note that whilst trees removed in this category are only likely to form a minor component of supply, any decision to remove trees will be subject to regulatory controls and processes, such as Environmental Impact Assessments in the EU. Indeed, where trees cleared for ecological reasons originate from areas managed as part of a wider forest, it would not be difficult to include them as part of the normal arrangements for forest management. These include international certification schemes, approved forest plans and felling licences - or comparable controls in other countries. Where these do not apply, there would still be relevant approvals and, for all fuel wood sold in the EU, details would be required under the EU Timber Regulation.

Where trees are removed as part of an ecological restoration project on non-forest land (for example, to restore heathlands, grasslands or wetlands etc.), a high level of evidence should be available (as set out above). However, as with arboricultural arisings, it is unlikely that this evidence would meet the sustainability provisions of the Timber Standard.

DECC therefore confirmed in its government response in August that an exemption from the Timber Standards is appropriate for material from ecological restoration where it originates from non-forest land.

- 2.22 **In line with the position in Great Britain, DETI therefore proposes to amend the NIRO legislation to exempt from the Timber Standard residues from arboriculture, and trees and wood being removed for ecological reasons where it originates from non-forest land.** This will help to maximise the environmental and economic benefits of this otherwise low value woody material. Where a generator of 1MW and above seeks to rely upon these exemptions, it will need to be verified as part of the annual sustainability audit report.

- 2.23 In the case of trees removed for ecological reasons in order to ensure that the exemption is being used appropriately, it is proposed that the following evidence should be provided for verification as part of the audit process; name of the ecological project, location, link to website with project information, amount of material in total expected to be extracted for bioenergy purposes and, where relevant, the name and reference number of any grant awarded.

Wind blow

- 2.24 In DECC's consultation in June 2014, DECC asked for evidence on the potential use of 'wind-blow' in bioenergy and asked for stakeholders views on whether 'wind-blow' should also be exempt from the Timber Standard and if so how it might be defined and what sort of evidence could be used to determine that wind blow wood is being correctly reported.
- 2.25 In its Government Response in August, DECC confirmed that wind blow will not be exempted from the Timber Standard at this stage. The main reasons being the arguments set out in relation to diseased trees. **Based on the evidence received by**

DECC and the potential unintended consequences in relation to diseased wood, DETI proposes not to exempt wind blow from the Timber Standard at this stage.

Residues from sawmills

- 2.26 It was also suggested to DECC that residues from saw mills should be exempt from the requirements of the Timber Standard. However, there are concerns that such derogation could, depending on future market prices, create a financial incentive to adapt sawmill processing techniques to produce more residues than is necessary during the production process. **In line with DECC's final policy decision, DETI proposes that non waste residues produced by saw mills should continue to be covered by the requirements of the Timber Standard.**

Proposal 4 – To add ‘highly biodiverse grasslands’ to the list of protected land types for the NIRO

- 2.27 From 2011, operators of generating stations using bioliquids under the NIRO have been required to comply with land criteria, as set out in Article 17 of the Renewable Energy Directive, in order to receive support. There are some exceptions for bioliquids produced from waste and residues (other than agricultural, aquaculture, fisheries and forestry residues). In the case of solid biomass and biogas, operators of generating stations over 50kW have been required under the NIRO to report against the same land criteria, with similar exceptions for waste and certain residues, as well as exceptions for landfill gas and sewage gas. (In Northern Ireland, from June 2014, solid biomass and biogas that is, or is derived from, wood must report against the Timber Standard in place of the land criteria).
- 2.28 From April 2015 it is intended to make compliance with the land criteria mandatory for those generating stations of 1MW and above that use non-wood solid biomass or biogas in order to receive ROCs. There will be exceptions for waste, certain residues, landfill gas, sewage gas and animal excreta.
- 2.29 The land criteria in the Renewable Energy Directive consist of a list of protected categories of land, including primary forest, wetlands and peatland. It also includes a category for highly biodiverse grassland that is:
- (i) Natural, namely grassland that would remain grassland in the absence of human intervention and which maintains the natural species composition and ecological characteristics and processes; or
 - (ii) Non-natural, namely grassland that would cease to be grassland in the absence of human intervention and which is species-rich and not degraded, unless evidence is provided that the harvesting of the raw material is necessary to preserve its grassland status.
- 2.30 The Renewable Energy Directive requires the European Commission (EC) to establish the criteria and geographic ranges to determine which grassland is to be regarded as highly biodiverse grassland. The EC is expected to adopt a Regulation in autumn 2014 establishing the criteria for ‘highly biodiverse grasslands’ for the

purposes of bioliquids¹. **DETI therefore proposes to add ‘highly biodiverse grasslands’ to the land criteria under the NIRO, in line with the other two ROs.**

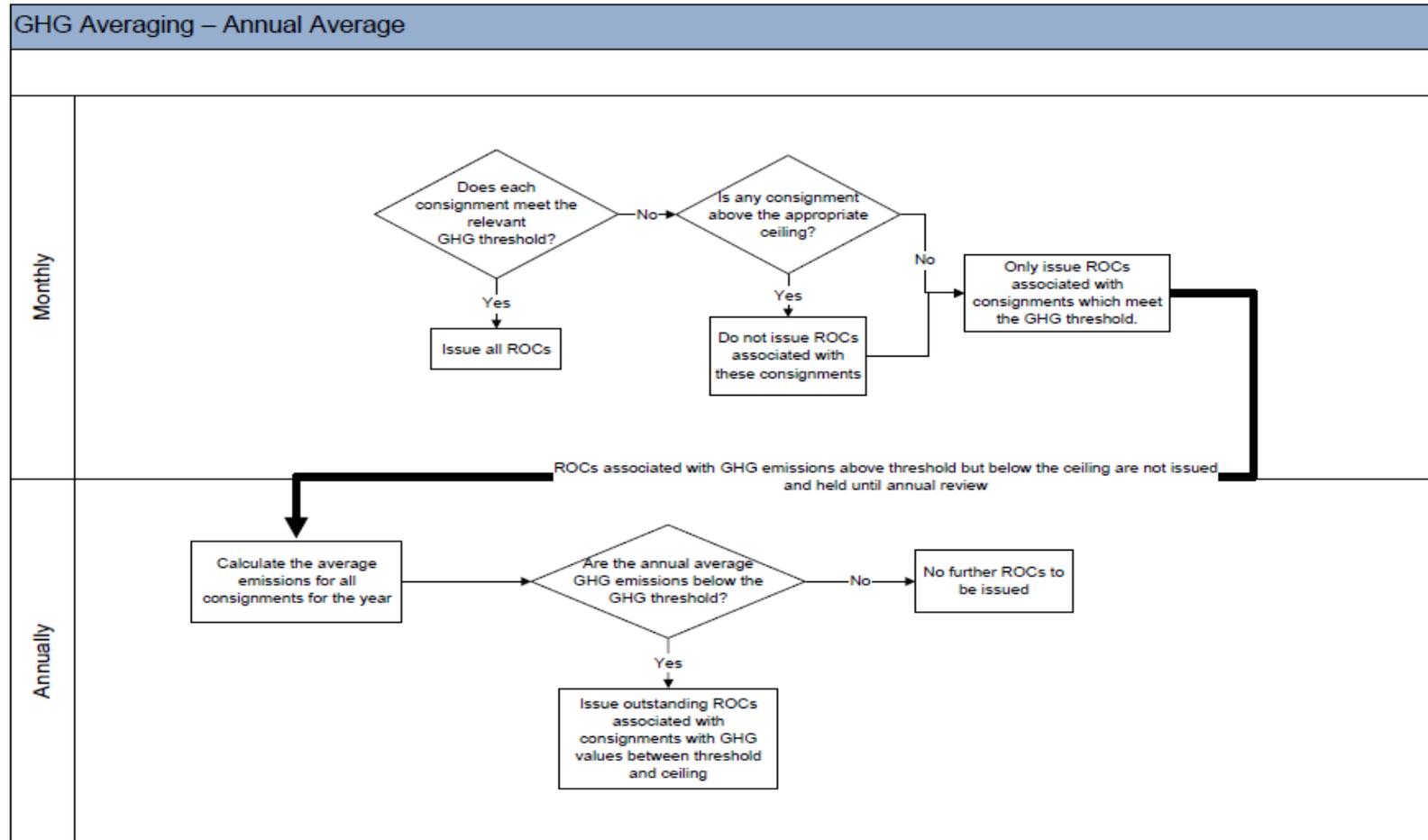
- 2.31 The introduction of the provision at this stage should help to avoid biomass being sourced from such grasslands. It will maintain consistency in the land criteria requirements between bioliquids and solid and gaseous biomass. It should therefore have been generally anticipated by potential users of biomass and we do not expect there to be any significant implications for biomass availability to Northern Ireland generators as a result of this proposed change.

Proposal 5 – Averaging of Greenhouse Gas Emissions across the year in the NIRO

- 2.32 The October 2013 DETI Government response to the supplementary consultation on biomass sustainability stated that ROCs would be issued on a monthly basis where the average GHG emissions of the consignments of solid and gaseous biomass used during that month were within the annual GHG targets set out in the Government Response. This creates a risk that ROCs might be issued for consignments of solid or gaseous biomass that meet the GHG criteria when calculated on the monthly basis, but fail to meet the GHG criteria when calculated on an annual basis.
- 2.33 DETI, in line with the GB position, **proposes to address this risk by issuing ROCs on a monthly basis only for those individual consignments that meet the GHG threshold. For any consignments that are above the GHG threshold but below the relevant ceiling, the ROCs would be withheld until the end of the obligation period. At the end of the obligation period, the annual average GHG emissions from all of the consignments of solid and gaseous biomass would be calculated, and only if it is below the GHG threshold, would the withheld ROCs be issued.** A flow chart depicting this process is set out below:

¹ draft of the Commission Regulation can be found at <http://ec.europa.eu/transparency/regcomitology/index.cfm?do=search.documentdetail&R4F9ljqc7JwOIZKU6R+jkO3VHGpxAa2+l3dJHmMDDvSBuE2177sL3dMBpRfefPrJ>

Chart 1 Proposed approach to annual averaging of GHG emissions for issue of ROCs



2.34 Analysis by DECC suggests that this proposal to withhold ROCs until the end of the obligation period where the GHG emissions of the consignment exceed the GHG threshold is likely to have a neutral impact on the overall number of ROCs that would be issued. It will remove the risk of ROCs being issued for consignments of solid biomass or biogas that exceed the GHG threshold when the annual average GHG emissions of all consignments also exceed the GHG threshold. Therefore, it avoids the need for claw back. But it does mean that generators will have to wait until the end of the obligation period before receiving ROCs for any consignments that exceed the GHG threshold. And if the annual average GHG emissions of all consignments of solid biomass and biogas used by the station is above the GHG threshold, generators will not receive ROCs for any of the consignments that were above the GHG threshold. This will actively encourage generators to work hard to bring down the annual average GHG emissions should they have issues with any particular consignments.

Default GHG value

2.35 In order to calculate an annual average, it is necessary to determine the GHG emissions from each consignment of solid biomass or biogas used by the generating station. Where the greenhouse gas emissions from a consignment are not known, or cannot be sufficiently verified, it is proposed to assign a default value to that consignment, for the purpose of the calculation of the annual average GHG emissions. The default will need to be sufficiently high to discourage its use in place of actual values where the actual GHG emissions of the consignment are suspected to be high. **In line with DECC's final policy decision, DETI proposes to set the default in line with the fossil fuel comparator for electricity production given in the Renewable Energy Directive. This is 91g CO2 eq per MJ or 327.6 kg/MWh.**

Consultation Question

The Department welcomes views on the above five proposals. If you disagree with any of the proposals please say why with evidence.

Annex A – Equality Assessment

Under section 75 of the Northern Ireland Act 1998, the Department is required to have due regard to the need to promote equality of opportunity:

- between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- between men and women generally;
- between persons with a disability and persons without; and
- between persons with dependants and persons without.

In addition, without prejudice to its obligations above, the Department is also required, in carrying out its functions relating to Northern Ireland, to have regard to the desirability of promoting good relations between persons of different religious beliefs, political opinions or racial group.

We have carried out an equality screening exercise in relation to these proposed changes and found that it does not have any significant equality impact. A full Equality Impact Assessment, therefore, is not required. The equality screening form is available to read on the DETI website¹.

¹ [Insert website link to Equality Screening Form]



Dep.....

Enterprise, Trade and Investment

www.detini.gov.uk

Your views on this
document are welcome.

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