Guide to keeping fuel records

for participants using 100 per cent biomass fuel and installations under 1MWth

Now that you've been accredited to the scheme, make sure you keep records of the fuel used in your biomass boiler so that you meet your ongoing reporting obligations.

All participants on the Non-Domestic RHI scheme have an obligation under Regulation 43(a) of the Renewable Heat Incentive Scheme Regulations 2018 (RHI Regulations) to keep, and provide upon request, records of the type of fuel used and fuel purchased for the duration of their participation in the scheme. You will be asked to provide all your records whenever your installation is audited. You may also be asked to provide them at other times.

Regulation 43(b) also requires participants who are using fuels authorised on the Biomass Suppliers List (BSL) or Sustainable Fuels Register (SFR), to keep the authorisation number of each fuel they use as part of the sustainability requirements. These list suppliers who have fuel(s) which are compliant with the RHI sustainability requirements, as assessed by each list manager. The BSL is for woody biomass (wood or wholly derived from wood, including waste-wood), and the SFR for non-woody. Please refer to chapter 4 in RHI guidance volume 2 for further details.

This guidance relates to installations under 1MWth. For the full guidance on keeping records and for information on installations 1MWth and above or biomethane producers, please see RHI guidance volume 2.

Why is it important?

You need to meet your ongoing compliance obligations to continue to receive your payments.

You must keep records of fuel purchased and used for your biomass boiler so that, in line with the regulations, we can verify that there is no fossil fuel contamination and that only 100 per cent biomass is used in your installation, and that the fuel is sustainable.

If you applied on or after 24 September 2013, your fuel records will also allow us to confirm that you have only used the fuels listed on your emissions certificate, provided as part of your application.

If you do not meet your ongoing obligations we may take enforcement action, which will include withholding or reducing your periodic support payments.

What records do I need to keep and for how long?

As long as you are participating in the scheme and receiving payments, you must keep fuel records that include the quantity (volume or weight) and type of biomass fuel used and the date that the fuel was delivered. Your records should also include any BSL or SFR authorisation numbers if you are purchasing authorised fuel or registered on either list in any capacity.

Additional requirements for participants who applied for accreditation on or after 24 September 2013

If you applied for accreditation on or after 24 September 2013 you must also:

- ensure that you only use fuels with a moisture content within the maximum level allowed for your installation. This level can be found in the RHI emission certificate you submitted as part of your application.
- maintain a record of the moisture content of your fuel. If you purchase your fuel the
 moisture content may be listed on your invoices or receipts. If you are sourcing your
 fuel yourself you may need to arrange to test its moisture content and keep these
 results on file.

Contaminated fuels

Where solid biomass contaminated with fossil fuel is used in an accredited RHI installation, you must keep and provide upon request written evidence including invoices, receipts and such other documentation relating to the fuel and fossil fuel used, and provide this information upon request.

How can I meet my ongoing obligations?

There is significant flexibility in how you keep your fuel records for your 100 per cent biomass boiler. As long as you capture and retain the required information, you may manage your fuel records any way that suits you.

To satisfy the requirements you must have records that show:

- volume or weight of biomass fuel used (and how you measured this)
- type of biomass fuel used (e.g. virgin wood pellets)
- where biomass fuel is sourced from (e.g. purchased from third party, self-supplied)
- date the fuel was delivered
- details of location where any harvesting took place (if self-supplied)
- amount of fuel/feedstock purchased, including invoices (if purchased from a third party)
- moisture content of your fuel (for applications made on or after 24 September 2013)
- BSL authorisation number(s) of the fuel if purchasing from the BSL or registered as a self-supplier (or producer-trader)

If you are purchasing your fuel from a third party you should keep all your invoices as a minimum, and you may like to enter the details into a log for ease of reference. For any self-supplied fuel, or if you have a mix of fuels, a good option is to capture the required information in a boiler log. You will also have to keep records of the BSL authorisation number(s) for your fuel(s) to ensure you meet the sustainability requirements.

Examples of boiler logs are included at the end of this guide.

What if I am using contaminated or ancillary fuel?

You may only use contaminated or ancillary fuel if your boiler is designed to burn that fuel and you have declared it within your application and been accredited on that basis. You must indicate the use of these in your records. Please refer to chapter 4 in RHI guidance volume 2 for specific information on what is required.

Contaminated fuel is any fuel that is not 100 per cent biomass, for example, painted or treated wood, MDF, etc. Ancillary fuel is sometimes used for ignition or similar, as outlined in the regulations.

Where can I find further information?

Please refer to RHI quidance volume 2 for further information about:

- your ongoing obligations as an accredited participant of the Non-Domestic RHI scheme
- specific requirements for installations using contaminated fuel or ancillary fossil fuel (chapter 4)
- details on how to comply with the sustainability requirements (chapter 3)
- specific requirements for biomass installations 1MWth and above (refer to chapter 9) or biomethane producers (refer to chapter 12), where additional sustainability reporting also applies.

Examples

Each installation is different and we know that participants manage their fuel differently, so we've provided a few different examples to help you understand your options.

Biomass fuel bought from a biomass fuel supplier – example only

Erin buys 4 tonnes of wood pellets for her biomass boiler every month from a wood pellet supplier whose fuel is authorised on the BSL.

Erin's records:

Erin retains copies of all invoices provided by the supplier. These invoices include the date of purchase, the date of delivery, the quantity by weight and the type of wood pellets bought, plus the BSL authorisation number. So she can easily keep track of her invoices, she records the details in a boiler log.

Why this works

Erin's purchase invoices can be used to determine the amount of fuel delivered to the boiler house and they show that she is meeting the sustainability requirements, so these invoices cover all the required information. If Erin can produce all these invoices on request, she meets the current requirements.

Example boiler log for Erin's fuel purchase records

Non-Domestic RHI boiler log - Erin's Guest House and Stables 2018

- Maximum allowed moisture content (as listed on the air quality certificate) is 12 per cent.
- Wood pellets are delivered in 500kg pallets, eight pallets delivered each month.

| Date of fuel delivery | Type of Biomass | Description/ moisture content* | Supplier | Quantity - weight or volume | Evidence | BSL authorisation number |
|-----------------------------|--------------------|--------------------------------------|-----------------------|--------------------------------------|----------------------|--------------------------------|
| 14/02/18 | Wood pellets | ENPLUS /12% | Pellet suppliers inc. | 4 tonnes | Receipt no. 54989 | BSL1234567- 1234 |
| 14/03/18 | Wood pellets | ENPLUS/11.5 % | Pellet suppliers inc. | 4 tonnes | Receipt no. 57992 | BSL1234567- 1234 |

^{*}Where known – it may be listed on invoices or receipts of purchase

2. Biomass fuel harvested from private woodland - example only

Henry harvests wood for his biomass boiler from his own estate. This wood is then chipped on site and fed into the boiler.

Henry's records:

Henry keeps a record of the number of trees felled each year, including the area of woodland from which the trees are harvested. He also records how much of his wood is chipped and when that happens.

Henry is also registered on the BSL as a self-supplier, and keeps a record of his BSL authorisation number.

In his boiler log he records the type of fuel, the date it is delivered to the boiler house and the quantity of each delivery of wood chips to the boiler house.

Why this works:

Henry's harvesting record identifies the source of the fuel so we can confirm his fuel as 100 per cent biomass.

His boiler log records the remainder of the information required to verify there has been no fossil fuel contamination and that he has not used any other types of fuel in his biomass boiler.

His registration on the BSL demonstrates that his fuel meets the sustainability requirements.

Example log for Henry's self-sourced fuel

Non-Domestic RHI boiler log - harvesting and chipping onsite 2018

- Fuel quantity is measured when it is chipped. One full chipper load is 500kg.
- All his fuel is self-supplied and authorised on the BSL, so has the same BSL authorisation number.

| Date of harvesting/chipping | Type of Biomass | Description | Quantity of fuel – weight or volume | BSL authorisation number |
|-----------------------------|--------------------|----------------------------------|---|--------------------------------|
| 13/02/2018 (chipping) | Logs | Beech trees from onsite woods | 1.5 tonnes | BSL7654321- 4321 |
| 27/02/2018 (chipping) | Logs | Assorted trees from onsite woods | 500kgs | BSL7654321- 4321 |
| 05/04/2018 | Logs | Beech trees from onsite woods | 4 tonnes | BSL7654321- 4321 |

(Please include any supporting evidence such as chipping receipts)

Henry keeps the receipts of his chipping machinery hire with his boiler log.

3. Biomass fuel supplied from waste wood - example only

Sara uses clean waste wood from where it first becomes waste at the local recycling centre to fuel her biomass installation. This waste wood is automatically fed into a hopper and then into the boiler via a closed off system.

Sara registers on the BSL as a self-supplier (for waste wood).

Sara's records:

Sara has measured the hopper capacity and maintains a boiler log that records when the hopper is emptied, as well as the type of fuel that goes into the hopper each time.

Why this works:

By measuring the hopper capacity Sara can easily record the quantity of fuel that goes to the boiler house by logging each hopper load. With that measurement she has been able to set up her boiler log template to cover all the information required to meet her obligations.

Her registration on the BSL demonstrates that her fuel meets the sustainability requirements.

Example of Sara's records of her 'waste wood' fuel source

2018 RHI boiler log - Sara's dairy & cheese making

- Fuel quantity is measured by the hopper load the capacity of the hopper is 300 litres.
- All her fuel is self-supplied and authorised on the BSL, so has the same BSL authorisation number.

| Date of fuel use | Waste wood type | Description | Quantity – weight or volume | BSL authorisation number |
|------------------|-----------------|-------------|-----------------------------------|--------------------------------|
| 26/01/2018 | Beech | Off-cuts | 300 litres | BSL1111111- |

| | | | | 1111 |
|------------|-------|----------|------------|---------------------|
| 10/02/2018 | Pine | Sawdust | 300 litres | BSL1111111- 1111 |
| 25/02/2018 | Beech | Off-cuts | 300 litres | BSL1111111- 1111 |

(Please indicate if you are using contaminated fuel, including paint/wood treatments, etc.)

4. Biomass fuel: some bought from biomass fuel supplier and some self-supplied as a processing residue – example only

Jamila uses both wood offcuts from her furniture business and wood chips purchased from a supplier with BSL authorised fuel to use in her biomass installation. To use offcuts from her own business she has registered on the BSL as a self-supplier.

Jamila's records:

Jamila retains copies of all invoices provided by the wood chip supplier, which includes BSL authorisation numbers and delivery dates. She also maintains a boiler log that records the type of wood used and the quantity, and the date each batch was supplied to the boiler house.

Why this works:

Together, the invoices and boiler log show the combined quantity of fuel delivered to the boiler. Invoices from the wood chip supplier provide evidence that the purchased fuel is 100 per cent biomass fuel, and sustainable. The boiler log provides the other required information, including when purchased fuel was used, when the offcuts were used, and the BSL authorisation number. The log is important for assurance that there was no fossil fuel contamination.

Example of Jamila's record of her combination of purchased fuel and self-supplied fuel

Fuel use log - Jamila's Discount Furniture

- Offcuts are delivered in a large bin capacity of one cubic metre.
- Wood chips are delivered in 500kg pallets.

| Date of fuel delivery | Type of Biomass | Description / moisture content* | Supplier | Quantity - weight or volume | Evidence | BSL authorisation number |
|-----------------------------|--------------------|-----------------------------------|-----------------------|-----------------------------|----------------------------|--------------------------------|
| 14/02/18 | Offcuts | Pine | Own | 2 bins | Covered by this fuel log | BSL222222- 2222 |
| 29/03/18 | Wood pellets | CEN/TC 335 Certified /11.5% | Pellet suppliers inc. | 1 tonne | Receipt No. 254- 223 | BSL3333333- 3333 |

(Please indicate if you are using contaminated fuel, including paint/wood treatments, etc)
*Where known – it may be listed on invoices or receipts of purchase

5. Biomass fuel records for multiple RHI installations – example only

Bill has two separate RHI biomass boilers with separate RHI numbers, installed at one address. Bill purchases the fuel for both of the boilers together from a wood chip supplier who has fuel authorised on the BSL and the fuel is delivered in one load.

Bill's records:

Bill keeps a record of all the invoices provided by the supplier. He also maintains two separate boiler logs (one for each installation) that record the amount of wood chips delivered to each boiler house. His logs record the type of fuel, the BSL authorisation number, the date the fuel is delivered and the quantity of each delivery of fuel to the individual boiler house.

Why this works:

Because Bill has two separate installations with unique RHI numbers he is required to keep records for each of his boilers.

His invoices verify that all fuel purchased is 100 per cent biomass fuel and sustainable. His individual boiler logs show what quantities are delivered to each location and how often, thereby covering the other fuel record requirements and his ongoing obligations.

Example of Bill's boiler log for his multiple installations

Example for boiler 1 (RHI installation: RHI0000001234):

Fuel use log - Boiler House 1, Farm Inc.

- All fuel is supplied by Wood Chip Supplies Inc.
- 15 tonnes of wood chips (30 x 500kg bags) delivered each month to main farm storehouse
- Maximum allowed moisture content (as listed on the air quality certificate) is 12 per cent.

| Date of fuel delivery | Type of Biomass | Description/ moisture content* | Source | Quantity - weight or volume | BSL authorisation number |
|-----------------------|--------------------|--------------------------------------|--------------------|-----------------------------------|--------------------------------|
| 14/02/2018 | Wood chips | Onorm M7 133/12% | Farm storehouse | 2 bags | BSL444444- 4444 |
| 21/02/2018 | Wood chips | Onorm M7 133/11.5% | Farm storehouse | 1 tonne | BSL444444- 4444 |

^{*}Where known - it may be listed on invoices or receipts of purchase

Example: Extract from log for boiler 2 (RHI installation: RHI0000001235):

| Date of fuel delivery | Type of Biomass | Description/ moisture content* | Source | Quantity - weight or volume | BSL authorisation number |
|-----------------------|--------------------|--------------------------------------|------------|-----------------------------------|--------------------------------|
| 17/02/2018 | Wood chips | Onorm M7 | Farm | 5 bags | BSL444444- |
| | | 133/12% | storehouse | | 4444 |
| 29/02/2018 | Wood chips | Onorm M7 | Farm | 2 bags | BSL444444- |
| | | 133/11.5% | storehouse | | 4444 |