

## Introduction

Renewable Heat Incentive (RHI) scheme is closed to new entrants. For recipients of the RHI the regulations governing the scheme set ongoing obligations.

These relate to the fuels that are used<sup>1</sup> and to the maintenance of the biomass boilers. Within these regulations requirements that are set and definition of the means of meeting these requirements provided. These definitions are prescribed in terms of identified standards and certification schemes. The possibility that other standards may be identified or created, and/or that other certification schemes may be established which would provide at least the same levels of quality and quality assurance is recognised in the regulations by the use of the concept of equivalence.

This document defines the criteria set that define equivalence in this context.

The assessment process examines claims of equivalence and considers whether the basic objectives of the regulation are met by other standards and certification schemes than those identified in the regulation.

The assessment is against the relevant benchmark of those defined by DESNZ:

- Maintenance standards for biomass boilers. The benchmark for this assessment will be the MCS 040 Standard.
- Accreditation schemes for biomass boilers maintenance standards. The benchmark for this assessment will be the HETAS Approved Biomass Maintenance Scheme.
- Fuel quality standards. The benchmarks for this assessment are the standards specified in Schedule 4A of the 2021 RHI Regulations<sup>2, 3</sup>.
- Certification schemes for fuel quality standards. The benchmark for this assessment is the Woodsure Certification Scheme<sup>3</sup>.

### NOTE:

1 DESNZ have temporarily disapplied the requirement in the regulations, SCHEDULE 4A, paragraph 2, "All wood pellets must meet the ENplus A1 standard or an equivalent standard." This disapplication is due to end on 23 November 2023.

2 DESNZ have specified that the woodfuel types specified in the regulation which are within the scope of Woodsure certification scheme may be included in the scope of an equivalence assessment.

3 Woodsure has approved the ENplus<sup>®</sup> certification scheme and standards as meeting the requirements set by it for woodpellets. Any wood pellet certification scheme will need to demonstrate that it meets or exceeds the standards set by the ENplus<sup>®</sup> scheme

## The Regulations

The relevant regulations and amendments thereto are included in the Statutory instruments:

2018 No. 611, ENERGY, The Renewable Heat Incentive Scheme Regulations 2018

2021 No. 76, The Domestic Renewable Heat Incentive Scheme and Renewable Heat Incentive Scheme (Amendment) Regulations 2021 [PART 3, insertion of Schedule 4A and amendment of regulation 47]

# NDRHI Fuel and Maintenance Standards and Schemes Equivalence Criteria



2022 No. 159, The Domestic Renewable Heat Incentive Scheme and Renewable Heat Incentive Scheme (Amendment) Regulations 2022 [PART 3, insertion of regulations 47A and 47B]

2022 No. 1096, ENERGY, The Renewable Heat Incentive Scheme (Amendment) Regulations 2022 [Amendment of Schedule 4A]

2022 No. 1217, ENERGY, The Renewable Heat Incentive Scheme (Amendment) (No. 2) Regulations 2022 [Amendment of Schedule 4A]

The UK government publishes legislation on [www.legislation.gov.uk](http://www.legislation.gov.uk).

## Assessment Body

Kiwa Ltd was appointed by DESNZ to define the assessment criteria and develop an application process for potential woodfuel certification bodies can apply for recognition from the Secretary of State of a scheme as equivalent.

This document contains a summary of the key requirements for a scheme to meet the equivalence test, defines the application and assessment process.



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## 1 Biomass Maintenance Standards

### 1.1 Scope

Biomass maintenance standards are documents that define the maintenance actions that need to be undertaken annually to ensure continued safe and efficient operation of a biomass boiler system.

### 1.2 Definitions

The relevant definitions from the regulations include:

“equivalent body” means a certification body which is approved by the Secretary of State under regulation 47B(1)(a);

“equivalent standard” means a document which—

- (i) specifies the standards to be met by a participant when carrying out the annual maintenance check of a boiler which uses solid biomass, or solid biomass contained in waste, as fuel; and
- (ii) is approved by the Secretary of State under regulation 47B(1)(b);

“maintenance standard” means MCS 040 or an equivalent standard

“MCS 040” means Issue 1.0 of the document entitled “MCS 040: Planned and Preventative Maintenance of Biomass Appliances – Requirements for Maintenance Engineers carrying out Maintenance Activities” published on 30th June 2021(1) or a subsequent version of that standard;

### 1.3 Regulatory Benchmark

The benchmark ‘biomass maintenance standard’ is MCS 040.

### 1.4 Eligibility Requirements

To be equivalent biomass maintenance standards shall:

- Have been developed by an organisation with suitable qualifications for the development of standards,
- Have a defined scope that may cover:
  - the entire size range for biomass boilers or some subset of this
  - all types of installation of biomass boilers or some defined sub-set of this
  - at least planned preventative maintenance activities
- Set requirements for maintenance businesses that are registered against the standard covering, to a level not lower than that in MCS 040, as a minimum:
  - Limitations of the Maintenance business
  - Management of sub-contractors
  - Maintenance contracts
  - Document control
  - Test and measurement equipment
  - Complaints handling
  - Health and safety

- Have been tested through a public consultation to confirm the appropriateness of the defined requirements

## 1.5 Verification of equivalence

Equivalence shall be demonstrated to the assessment body.

Evidence that eligibility requirements are met shall be submitted to the assessment body.

A recommendation for recognition of equivalence depends on the demonstration that the Eligibility Requirements are met.

## 1.6 Ongoing equivalence

Any approval of a standard may be revoked by the Secretary of State if equivalence is not maintained.

To provide owners of approved standards with a means of evidencing ongoing equivalence annual reviews will be available through the Assessment Body. This is not a statutory requirement.

The Secretary of State may require a review of equivalence should this status be questioned.

Any proposed changes to an approved standard shall be notified to the Assessment body before implementation such that they can be reviewed to determine whether equivalence will be maintained.

## 2 Biomass Maintenance Schemes

### 2.1 Scope

Biomass maintenance schemes are designed to ensure that biomass maintenance standards are appropriately applied by maintenance engineers.

### 2.2 Definitions

The relevant definitions from the regulations include:

“equivalent body” means a certification body which is approved by the Secretary of State under regulation 47B(1)(a);

“equivalent standard” means a document which—

- (i) specifies the standards to be met by a participant when carrying out the annual maintenance check of a boiler which uses solid biomass, or solid biomass contained in waste, as fuel; and
- (ii) is approved by the Secretary of State under regulation 47B(1)(b);

“maintenance standard” means MCS 040 or an equivalent standard

“MCS 040” means Issue 1.0 of the document entitled “MCS 040: Planned and Preventative Maintenance of Biomass Appliances – Requirements for Maintenance Engineers carrying out Maintenance Activities” published on 30th June 2021(1) or a subsequent version of that standard;

### 2.3 Regulatory Benchmark

The benchmark biomass maintenance scheme is the HETAS Biomass Maintenance Scheme. This offers registration of servicing businesses demonstrating competency to carry out the required maintenance actions.

### 2.4 Eligibility Requirements

Recognised equivalent biomass maintenance schemes shall as a minimum:

- Be based on a standard developed and governed independently of the organisation operating the scheme
- Be operated in accordance with the requirements of the owner of the maintenance standard (the MCS Service Company Ltd for MCS 040 or the owner of the selected alternative equivalent maintenance standard).
- Be operated by an organisation demonstrably experienced in the operation of certification schemes with accreditation for similar activities against BS EN ISO 17065
- Be controlled under an appropriate, documented and maintained Quality Management System
- Ensure that registered maintenance businesses have and can demonstrate:
  - The necessary competencies for the scope of the activities for which they are registered
  - Where the scope of the businesses includes domestic customer, membership of an appropriate consumer code
  - Management of subcontractors including:

- Validation of competencies as above.
- Contractual arrangements between business and subcontractor.
- Use of appropriate maintenance contracts for all customer types:
  - For domestic customers - formal contract required which conforms to relevant consumer protection legislation. Adequate insurances shall be in place.
  - For commercial customers – formal contract may be required.
- Document control – the QMS shall include:
  - Access to relevant standards (latest versions).
  - Appliance instructions defining maintenance requirements.
  - Records of work carried out / contract shall be kept for 6 years.
  - Measurement equipment calibration records.
  - Evidence of individual engineer competence.
  - Complaints records.
  - Sub-contract agreements.
- A mechanism for issuing to the biomass system owner, once necessary maintenance actions have been completed, certificates confirming this

## 2.5 Verification of equivalence

Equivalence shall be demonstrated to the assessment body.

Evidence that eligibility requirements are met shall be submitted to the assessment body.

A recommendation for recognition of equivalence depends on the demonstration that the Eligibility Requirements are met.

## 2.6 Ongoing equivalence

Any approval of a Certification Body may be revoked by the Secretary of State if equivalence is not maintained.

To provide approved Certification Bodies with a means of evidencing ongoing equivalence annual reviews will be available through the Assessment Body. This is not a statutory requirement.

The Secretary of State may require a review of equivalence should this status be questioned.

Any proposed changes to a scheme operated by an approved Certification Body shall be notified to the Assessment body before implementation such that they that can be reviewed to determine whether equivalence will be maintained.

### 3 Wood Fuel standards

#### 3.1 Scope

A fuel quality standard defines the minimum requirements of a range fuel characteristics and the is an assurance process which covers the whole chain, from the supply of raw materials to the point of delivery to the participant.

#### 3.2 Definitions

The relevant definitions from the regulations include:

“woodfuel” means<sup>1</sup>:

- (a) woodchip;
- (b) logs;<sup>2</sup>
- (c) wood pellets; and
- (d) wood briquettes

“fuel quality criteria” means the criteria for woodfuel quality specified in Schedule 4A in relation to solid biomass which is wood;

“self-supplied” means —

- (a) obtained by or on behalf of the participant from a permitted location; or
- (b) waste wood which is obtained by or on behalf of the participant from the place where it first becomes waste;

“sustainable solid biomass” means—

- (a) solid biomass which meets the greenhouse gas criteria, the land criteria and the fuel quality criteria;
- (b) solid biomass which is—
  - (i) self-supplied;
  - (ii) used in an accredited RHI installation with an installation capacity of less than 1MWth; and
  - (iii) either—
    - (aa) an approved sustainable fuel; or
    - (bb) a fuel in respect of which the Secretary of State has made a declaration under regulation 51(5);
- (c) solid biomass which is waste, or is wholly derived from waste;
- (d) solid biomass which consists of a combination of any of the solid biomass listed in paragraphs (a) to (c).

ENplus<sup>®</sup> A1 means<sup>3</sup>: the wood pellet specification published in the issue of the ENplus<sup>®</sup> Handbook Part 3 Pellet Quality Requirements current at the time of application for assessment for woodfuel standard equivalence.

#### NOTES



1 DESNZ have specified that the woodfuel types specified in the regulation which are within the scope of Woodsure certification scheme may be included in the scope of an equivalence assessment.

2 Woodsure uses the term “firewood”.

3 Woodsure has approved the ENplus® certification scheme and standards as meeting the requirements set by it for woodpellets. Any wood pellet certification scheme will need to demonstrate that it meets or exceeds the standards set by the ENplus® scheme

### 3.3 Regulatory Benchmark

Fuel quality standards. The benchmarks for this assessment are the standards specified in Schedule 4A of the 2021 RHI Regulations.

### 3.4 Eligibility Requirements

To be equivalent fuel quality standards for woodfuel shall:

- Have been developed by an organisation with suitable qualifications for the development of standards,
- Set requirements that will ensure that the woodfuel has the characteristics of “sustainable solid biomass”
- Have been tested through a public consultation to confirm the appropriateness of the defined requirements

### 3.5 Verification of equivalence

Equivalence shall be demonstrated to the assessment body.

Evidence that eligibility requirements are met shall be submitted to the assessment body.

A recommendation for recognition of equivalence depends on the demonstration that the Eligibility Requirements are met.

### 3.6 Ongoing equivalence

Any approval of a standard may be revoked by the Secretary of State if equivalence is not maintained.

To provide owners of approved standards with a means of evidencing ongoing equivalence annual reviews will be available through the Assessment Body. This is not a statutory requirement.

The Secretary of State may require a review of equivalence should this status be questioned.

Any proposed changes to an approved standard shall be notified to the Assessment body before implementation such that they that can be reviewed to determine whether equivalence will be maintained.

## 4 Wood Fuel Certification Schemes

### 4.1 Scope

The certification scheme must provide assurance of the supply chain of the woodfuel.

The scheme may be defined in a way to enable it to be applied to Self suppliers.

The scheme may be defined in a way that includes a mechanism for assessing a Self-Reporter's internal quality system which is certificated against ISO 9001 to ensure that it meets the scheme's minimum requirements.

### 4.2 Definitions

The relevant definitions from the regulations include:

"woodfuel" means<sup>1</sup>:

- (a) woodchip;
- (b) logs;<sup>2</sup>
- (c) wood pellets; and
- (d) wood briquettes

"self-supplied" means —

- (a) obtained by or on behalf of the participant from a permitted location; or
- (b) waste wood which is obtained by or on behalf of the participant from the place where it first becomes waste;

"sustainable solid biomass" means—

- (a) solid biomass which meets the greenhouse gas criteria, the land criteria and the fuel quality criteria;
- (b) solid biomass which is—
  - (i) self-supplied;
  - (ii) used in an accredited RHI installation with an installation capacity of less than 1MWth; and
  - (iii) either—
    - (aa) an approved sustainable fuel; or
    - (bb) a fuel in respect of which the Secretary of State has made a declaration under regulation 51(5);
- (c) solid biomass which is waste, or is wholly derived from waste;
- (d) solid biomass which consists of a combination of any of the solid biomass listed in paragraphs (a) to (c).

ENplus<sup>®</sup> A1 means<sup>3</sup>: the wood pellet A1 specification published in the issue of the ENplus<sup>®</sup> Handbook Part 3 Pellet Quality Requirements current at the time of application for assessment for woodfuel standard equivalence.

## NOTES

1 DESNZ have specified that the woodfuel types specified in the regulation which are within the scope of Woodsure certification scheme may be included in the scope of an equivalence assessment.

2 Woodsure uses the term “firewood”.

3 Woodsure has approved the ENplus® certification scheme and standards as meeting the requirements set by it for woodpellets. Any wood pellet certification scheme will need to demonstrate that it meets or exceeds the standards set by the ENplus® scheme.

### 4.3 Regulatory Benchmark

Certification schemes for fuel quality standards. The benchmark for this assessment is the Woodsure Certification Scheme<sup>1,2</sup>.

#### NOTE:

1 Woodsure has approved the ENplus® certification scheme and standards as meeting the requirements set by it for woodpellets. Any wood pellet certification scheme will need to demonstrate that it meets or exceeds the standards set by the ENplus® scheme.

2 Woodsure covers Self suppliers as follows: key areas of the Woodsure Certification Scheme have had requirements set proportionate to the activity and the self supplier is required to have a quality system that deals with these set out in a suitable quality manual. The manual is assessed and the required fuel testing carried out. An equivalent scheme could cover these producers by defining an equivalent approach for their scheme.

### 4.4 Eligibility Requirements

Equivalent woodfuel certification schemes shall:

- Be based on a standard or standards owned, developed and governed independently of the organisation operating the certification scheme and validated through a process of public consultation<sup>1</sup>.
- Be designed such that it is able to provide assurance with regards the delivered fuel quality specified as equivalent with regards the Biomass Suppliers List requirements for sustainable solid biomass.
- Be designed to be accreditable and so possible for a certification body operating the scheme to be accredited. The principles of the BS EN ISO/IEC 17067:2013 should be applied.
- Be operated in accordance with the requirements of the owner of the standards.
- Be operated by an organisation:
  - demonstrably experienced in the operation of certification schemes with accreditation for similar activities against BS EN ISO 17065 or an equivalent
  - with the capability to ensure that any certification body operating their scheme complies with the requirements of the scheme.
- Be controlled under an appropriate, documented and maintained Quality Management System

- Be delivered by a Certification Body demonstrably be able to assess the entire production process to ensure quality, which is equivalent to the role performed by Woodsure. This shall be assessed by the scheme owner which could also be the certification body.

## NOTE:

1 The Woodsure certification scheme and the ENplus® certification scheme are based on the requirements of EN 15234-1:2011. Guidance on product certification schemes is available in BS EN ISO/IEC 17067:2013 'Conformity assessment — Fundamentals of product certification and guidelines for product certification schemes'.

### 4.5 Verification of equivalence

Equivalence shall be demonstrated to the assessment body.

Evidence that eligibility requirements are met shall be submitted to the assessment body.

A recommendation for recognition of equivalence depends on the demonstration that the Eligibility Requirements are met.

### 4.6 Ongoing equivalence

Any approval of a Certification Body may be revoked by the Secretary of State if equivalence is not maintained.

To provide approved Certification Bodies with a means of evidencing ongoing equivalence annual reviews will be available through the Assessment Body. This is not a statutory requirement.

The Secretary of State may require a review of equivalence should this status be questioned.

Any proposed changes to a scheme operated by an approved Certification Body shall be notified to the Assessment body before implementation such that they that can be reviewed to determine whether equivalence will be maintained.