UK Risk Based Regional Assessment for the Biomass Suppliers List

SECTION 1: Background

Why do I need to complete this UK Risk Based Regional Assessment?

This form allows woodfuel buyers and suppliers to provide evidence that woodfuel is sourced legally and sustainably, without the use of certification.

For background information, please visit the Biomass Suppliers List (BSL) website and read the following documents:

|  |
| --- |
| **Title of Publication** |
| [BSL Land Criteria Guidance](https://biomass-suppliers-list.service.gov.uk/documents-and-guidance) |
| [BSL Risk Based Regional Assessment & Mass Balance Approach](https://biomass-suppliers-list.service.gov.uk/documents-and-guidance) |

Where do I send this UK Risk Based Regional Assessment once completed?

Please upload a completed UK Risk Based Regional Assessment form to your BSL application via the BSL portal.

Please keep all evidence for at least five years in the eventuality of an audit by BSL.

SECTION 2: How to complete this form

Do you source less than 750 tonnes of virgin timber/annum?1

If the answer is yes, complete Section 3 with your details and sign and date Section 6.

Do you source 750 tonnes or more virgin timber/annum?

If the answer is yes, complete Section 3 with your details. Please read Section 4, complete the table in Section 5 and sign and date Section 6.

1Virgin timber includes trees and branches, shavings and sawdust, removed during forestry, woodland, riverbank management or from watercourses following flooding and virgin timber shavings and off-cuts produced by sawmills, woodworking or timber product manufacture before the virgin timber is

subject to treatment or use.

SECTION 3: My Details

Your company (or your name if you do not have a company)

|  |  |
| --- | --- |
| **Company name:** |  |
| **Company address:** |  |

Your depot (site 1) (as per your BSL registration)

|  |  |
| --- | --- |
| **Site address:** |  |
| **Site activities:** |  |
| **Woodfuel(s) produced at site:** |  |
| **Type of raw materials supplied to site:2** |  |
| **Average distance from source:** |  |
| **County(s) supplies originate from:** |  |
| **Raw material(s) annual quantity:** |  |
| **BSL reference number(s) (if any):** |  |

Your depot (site 2) (as per your BSL registration)

|  |  |
| --- | --- |
| **Site address:** |  |
| **Site activities:** |  |
| **Woodfuel(s) produced at site:** |  |
| **Type of raw materials supplied to site:** |  |
| **Average distance from source** |  |
| **County(s) supplies originate from:** |  |
| **Raw material(s) annual quantity:** |  |
| **BSL Registration number(s) (if any):** |  |

2 Raw materials are set to undergo further processing (e.g. cutting, drying chipping) before they are used in a boiler.

If you source 750 tonnes or more of virgin timber /annum, please complete Section 5 and Section 6.

If you source **less** than 750 tonnes of virgin timber/annum, please sign and date Section 6.

SECTION 4: Rationale

The Region

The region is defined as the United Kingdom of Great Britain and Northern Ireland.

England, Wales, Scotland & Northern Ireland all have similar legislation in regard to: Land ownership; harvesting rights; biodiversity; water; air; soil protection; tree felling licencing; and replanting or regeneration requirements. The forest operations adhere to the UK Forestry Standard (UKFS). They also have similar legislation to: Basic labour rights; health & safety of forest workers; waste handling; and disease control.

Supply Base

The supply base into our UK customers will be from anywhere within the above defined region.

Rationale

As defined above the UK as a region is at low risk of non-compliance with the Woodfuel Land Criteria as outlined in the Timber Standard for Heat & Electricity, and as such the non-certified material (Controlled Wood) we handle within this region complies with Category B of the Standard.

Forestry Commission statistics for 2020 [here](https://www.forestresearch.gov.uk/tools-and-resources/statistics/forestry-statistics/), state that [82% of all softwood harvested](http://www.forestry.gov.uk/website/forstats2014.nsf/0/5646FE817AB3C3A680257322004AF3B4) in 2019 in the UK is certified by an approved forest certification scheme. Hardwood account for just over 8% of the timber harvested in the UK. Trees felled in the UK must either be covered by a Felling Licence/Permission or to a much lesser degree planning regulations (the latter being exempt from the RO & RHI regulations).

The UK Government’s Central Point of Expertise on Timber [here](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/324795/CPET_Growers_Guide_-_Final_Dec13.pdf) estimate that significantly less than 0.1% of UK timber was harvested without full consent of the regulatory authorities. Although the incidence of illegally felled harvested timber is low, no timber sales can be entered onto our internal systems without evidence provided to enable reference to a Felling Licence/Permission or planning consent whether the sale is certified by an approved forest certification scheme or not. The majority of material purchased is softwood material and we can assume that the proportion certified matches the FC statistics at nearly 90%.

Legality

The UK Government exempts Arboriculture Residues from the RHI requirement to have a Felling Licence/Permission. Arboriculture Residues are considered to come from a sustainable source, i.e. they will be ‘deemed’ to meet the Timber Standard for Heat and Electricity criteria. Under the RED Land Criteria, we believe this material is already ‘deemed sustainable’ as it comes from ‘Settlement’ land and therefore currently meets the Timber Standard.

Timber removed for infrastructure projects, e.g. windfarm development must comply with planning legislation which included statutory and public consultation processes and in some cases an EIA. The Felling Licence process includes a 28-day period of statutory and public consultation, with all applications being placed on a public register - <https://www.gov.uk/guidance/consultation-and-the-public-registers>. Felling Licences/Permissions are only granted where the Forestry Commission for England, Scottish Forestry and NRW are satisfied that the social and environmental criteria in the UKFS are met.

Legality is clearly demonstrated through the due process and the determination of sustainability within the region, i.e. the UK is therefore an open, transparent & consultative process, and all stakeholders have the opportunity to comment on any application.

The risk of non-compliance can be considered as low risk and therefore the Controlled Wood timber as meeting Category B of the Timber Standard. The evidence of applying low risk category to the UK is backed up by reference to the completed check list.

SECTION 5: Evidence

Please complete the table below. Examples of evidence must be provided.

|  |  |  |  |
| --- | --- | --- | --- |
| **Material type** | **Example evidence** | **Your Evidence** | **% of virgin timber purchased from within the UK that is UK sourced. Must add up to 100%** |
| Virgin roundwood from forestry | | | |
| Own woodland | *Certified Woodland Management Plan and/or covered by Long Term Management Plan or Felling Licence/Permission* |  |  |
| Third party woodland | *Long Term Management Plan or Felling Licence/Permission* |  |  |
| Windblow | *Photograph Evidence/Felling Permission in Scotland* |  |  |
| Arboriculture arisings | | | |
| Residues | *Deemed sustainable* |  |  |
| Habitat management or restoration | *Covered by EIA/Regulatory Authority Approval* |  |  |
| Sawmill residues and co-products | | | |
| Virgin residues | *Sawmill residues have Chain of Custody* |  |  |
| Energy crops | *Planted under Energy Crops Scheme or Farm Single Payment Scheme* |  |  |
| Traditional coppice | *Long term management plan* |  |  |

Regional checklist

The following table sets out how I am complying with the **credibility requirements** of the Timber Standard:

|  |  |
| --- | --- |
| **Timber standard requirement** | **Evidence provided** |
| S1. The definition must be consistent with a widely accepted set of international principles and criteria defining sustainable or responsible forest management at the forest management unit level.  S2. The definition must be performance-based, meaning that measurable outputs must be included and cover all of the issues set out in S5 to S10.  S3. The process of defining sustainable must seek to ensure balanced representation and input from the economic, environmental and social interest categories.  S4. The process of defining sustainable must seek to ensure:  a. no single interest can dominate the process for setting or changing the policy; and  b. no decision on the contents of the policy can be made in the absence of agreement from the majority of an interest category | 82% of all timber harvested in the UK is certified under internationally recognised certification schemes .  England: <https://www.gov.uk/guidance/tree-felling-licence-when-you-need-to-apply>  Scotland: <https://forestry.gov.scot/support-regulations/felling-permissions>  Wales: <https://naturalresources.wales/permits-and-permissions/tree-felling-and-other-regulations/tree-felling-licences/?lang=en>  Northern Ireland: <https://www.daera-ni.gov.uk/publications/applying-felling-licence> All commercial timber in the UK must be felled with a Felling Licence/Permission or other felling approval such as a Statutory Plant Health Notice(unless exempt)  Timber removed for infrastructure projects must comply with planning legislation which includes statutory and public consultation processes.  The Felling Licence/Permission process includes a 28-day period of statutory and public consultation, with all application being placed on a public register https://www.gov.uk/guidance/consultation-and-the-public-registers Felling Licences/Permissions are only granted where the Forestry Commission England, Scottish Forestry, NRW for Wales and DAERA for Northern Ireland are satisfied that the social and environmental criteria in the UKFS are met.  The determination of sustainability is therefore an open, transparent and consultative process through the UK, and all stakeholders have the opportunity to comment on any application.  The risk of non-compliance with these requirements in the GB can be considered to be low. See <https://www.gov.uk/government/publications/the-uk-forestry-standard> |

The following table sets out how I am complying with the **sustainability requirements** of the Timber Standard:

| **Timber standard requirement** | **Evidence provided** |
| --- | --- |
| S5. Management of the forest must ensure that harm to ecosystems is minimised. In order to do this the policy must include requirements for: | 44% of the total woodland area in the UK is independently certified. The remaining 56% of uncertified woodland contains a very large area of ‘unmanaged’ woodland. 82% https://www.gov.uk/guidance/environmental-impact-assessments-for-woodland-overview  For timber harvested under a UKFS Felling Licence/Permission the Felling Licence/Permission must be approved by the regulatory authority and may be inspected. All woodlands must be managed in compliance with the statutory legislation which is actively enforced in the UK.  The UK Forestry Standard https://www.gov.uk/government/publications/the-uk-forestry-standard |
| 1. protection of soil, water and biodiversity | As 5a above. See:  https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/687147/The\_UK\_Forestry\_Standard.pdf  Forests and Biodiversity [6.1 Biodiversity](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/687147/The_UK_Forestry_Standard.pdf)  Forests and Water [6.7 Water](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/687147/The_UK_Forestry_Standard.pdf) Forests and Soil [6.6 Soil](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/687147/The_UK_Forestry_Standard.pdf) |
| 1. controlled an appropriate use of chemicals and use of Integrated Pest Management wherever possible | As 5a above.  There is a UK pesticide policy to regulate and minimise the use of pesticides in UK Forestry  <https://www.gov.uk/government/publications/pesticides-uk-national-action-plan>  Extensive guidance and resource is available to support integrated pest management <https://www.gov.uk/guidance/manage-a-tree-pest-or-disease-overview> |
| 1. proper disposal of wastes to minimise any negative impacts | As 5a above – the UK Forestry Standard considers waste management throughout the document.  Waste management is tightly regulated in UK forests  England: <https://www.gov.uk/managing-your-waste-an-overview>  Wales: https://naturalresources.wales/guidance-and-advice/environmental-topics/waste-management/?lang=en  Scotland: https://www.sepa.org.uk/regulations/waste/  Northern Ireland: https://www.daera-ni.gov.uk/topics/waste |
| S6. Management of the forest must ensure that productivity of the forest is maintained.  82% of all timber harvested in the UK is certified by international approved forest certification schemes.  In order to achieve this, the policy must include requirements for: | |
| 1. management planning and implementation of management activities to avoid significant negative impacts on forest productivity; | As 5a above. |
| 1. adequate monitoring to check compliance with all requirements, together with review and feedback into planning; | As 5a above. |
| 1. operations and operational procedures which minimise impacts on the range of forest resources and services; | As 5a above. |
| 1. adequate training of all personnel; employees and contractors; | As 5a above. |
| 1. harvest levels that do not exceed the long-term production capacity of the forest based on adequate inventory and growth and yield data. | As 5a above. |
| S7. Management of the forest must ensure that ecosystem health and vitality is maintained. In order to achieve this, the definition of sustainable must include requirements for: | |
| 1. management planning to maintain or increase the health and vitality of ecosystems; | As 5a above. |
| 1. management of natural processes, fires, pests and diseases; and | As 5a above.  Additionally, the regulatory authority has active polices for control of pests and diseases including the imposition of plant health restrictions, timber movement restrictions and enforced felling. |
| 1. protection of the forest from unauthorised activities such as illegal logging, mining and encroachment. | As 5a above. |
| S8. Management of the forest must seek to ensure that biodiversity is maintained. In order to achieve this there must be: | |
| 1. implementation of safeguards to protect rare, threatened and endangered species; | As 5a above.  Note also that statutory regulatory authorities with responsibility for protecting and safeguarding rare, threatened and endangered species are included in the statutory consultation process.  The UK Forestry Standard https://www.gov.uk/government/publications/the-uk-forestry-standard |
| 1. the conservation/set-aside of key ecosystems or habitats in their natural state; and | As 5a above.  Note also that statutory regulatory authorities with responsibility for conservation/set-aside of key ecosystems or habitats are included in the statutory consultation process.  The UK Forestry Standard https://www.gov.uk/government/publications/the-uk-forestry-standard |
| 1. the protection of features and species of outstanding or exceptional value. | As 5a above.  Note also that statutory regulatory authorities with responsibility for protection of features and species of outstanding or exceptional value are included in the statutory consultation process.  The UK Forestry Standard https://www.gov.uk/government/publications/the-uk-forestry-standard |
| S9. The forest management organisation and any contractors must comply with local and national legal requirements relevant to: | |
| 1. labour and welfare; and | As 5a above.  Note that there is extensive labour and welfare legislation in the UK which is actively enforced. |
| 1. health and safety. | As 5a above.  Note that there is extensive labour and welfare legislation in the UK which is actively enforced. |
| S10. Management of the forest must have full regard for:  82% of all timber harvested in the UK is certified to FSC &/or PEFC. | |
| 1. identification, documentation and respect of legal, customary and traditional tenure and use rights related to the forest; | Legal, customary and traditional tenure and use rights are protected through the UK legal system which is actively enforced. There are no indigenous peoples in the UK.  Traditional tenure and use rights of local communities related to the forest are identified, documented and respected in forests certified by international certification schemes and those managed under an approved UKFS Management Plan.  For the remaining 5% of woodland these traditional tenures and use rights of local communities related to the forest may not be documented. |
| 1. mechanisms for resolving grievances and disputes including those relating to tenure and use rights, to forest (or land) management practices and to work conditions | There are active mechanisms in the UK for resolving disputes relating to use rights, to forest (or land) management practices and to work conditions. |
| 1. safeguarding the basic labour rights and health and safety of forest workers. | Basic labour rights and health and safety of forest workers are safeguarded through the UK legal system which is actively enforced.  Freedom of association and the effective recognition of the right to collective bargaining are included in UK legislation which is actively enforced. There is a very low risk of compulsory or forced labour in the UK. There is a low risk of child labour in the UK. Elimination of discrimination in respect of employment and occupation is included in UK legislation which his actively enforced.  Forestry was specifically exempted from UK Gangmasters legislation.  https://www.gla.gov.uk/who-we-are/legislation/ |

SECTION 6: Declaration

Declaration, Sampling and Auditing Methodology

I agree that:

* I will keep adequate records to evidence my sourced raw materials for five-years. This could include; invoices, delivery notes, Felling Licence/Permission numbers, certification reference numbers or planning permission reference numbers.
* Each year I/we will check 20% of my/our suppliers to verify the evidence provided is correct.

I/we explicitly agree currently, and in the future, not to be directly or indirectly involved in the following unacceptable activities:

a) Illegal harvesting or the trade in illegal wood or forest products;

b) Violation of traditional community and/or human rights in forestry operations;

c) Destruction of high conservation values in forestry operations;

d) Significant conversion of forests to plantations or non-forest use;

e) Introduction of genetically modified organisms in forestry operations;

f) Violation of any of the ILO Core Conventions as defined in the ILO Declaration on Fundamental Principles and Rights at Work.

|  |  |
| --- | --- |
| **Company or individual name:** |  |
| **Signed:** |  |
| **Dated:** |  |