

## Response ID ANON-JW5K-HF4G-A

Submitted to **Renewable Heat Incentive: biomass combustion in urban areas**  
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### About you

#### What is your name?

**Name:**  
Julie Godefroy

#### What is your email address?

**Email:**  
JGodefroy@cibse.org

#### What is your organisation?

**Organisation:**  
Chartered Institution of Building Services Engineers (CIBSE)

**Does your interest in the RHI relate to the operation of the scheme in a particular geographical area? Responses which indicate that your interest relates to the operation of the scheme in Scotland or Wales will be shared with the Scottish or Welsh devolved authorities respectively, unless you explicitly state that you do not wish for your response to be shared. Please indicate all those that apply**

Scotland, Wales, England

**Are you happy for your response to be published? Information provided in response to this call for evidence, including personal information, may be subject to publication or disclosure in accordance with access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). If you want information that you provide to be treated as confidential please indicate this below and outline why you regard the information you have provided to us 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.**

Yes

**Please provide any further information on why your response is confidential:**

**Would you like to be contacted when the consultation response is published?**

Yes

**(optional) How did you hear about this consultation?**

**Where did you hear of this consultation?:**  
Email from BEIS

**Other (please specify):**

### Introduction

### Proposals

### The consultation

**1 Do you agree with the proposal to remove RHI support for biomass in urban areas on the gas grid?**

Yes

**Please provide any available evidence in support of your response:**

Yes we agree.

Government strategies should be holistic, and financial support for one objective (e.g. reducing carbon) should not jeopardise other objectives (e.g. improving air quality). Moreover, by the government's own statistics in this consultation document this would only affect a small proportion of new installations (currently 4.6%) and should not therefore have a significant impact on overall carbon objectives.

It is worth noting that biomass installations in urban environments have a negative impact on air quality both directly due to the particulate emissions from the biomass burners, and indirectly due to the emissions associated with fuel delivery.

**2 Do you agree that for the purposes of this restriction, the criterion should be based on being both urban and having access to the gas network?**

Yes

**Please provide any available evidence in support of your response:**

Yes, this is a sensible combination of conditions.

However, as the objective here is to avoid worsening air quality in areas where it is already unsatisfactory, we wonder whether a review could be carried out of how many biomass RHI installations are in urban areas which have NO gas connection BUT which are Air Quality Management Areas; there may only be a small number (or no) such areas, but if there are, we would think they may also be considered for exclusion from the RHI. While fewer options would be available, there would still be others e.g. heat pumps.

**3 If 'you have answered No' to Question 2, what method would be more appropriate and why?**

**What eligibility criterion should be used?:**

**How could this criterion be verified by Ofgem? Please provide any available evidence in support of your response.:**

**4 Should installations that comply with stricter emissions criteria such as those under the Medium Combustion Plant Directive be included in this proposal?**

Yes

**Please provide any available evidence in support of your response:**

Yes, we think they should be included, i.e. NOT be eligible for RHI. As the government's own figures show, even the least polluting biomass installations have much higher emission levels than the equivalent gas installation. As this only concerns a small proportion of RHI installations anyway, we see no reason for introducing exemptions.

**5 Should biogas combustion remain eligible without geographical restriction?**

Yes

**Please provide any available evidence in support of your response:**

We do not have sufficient information to advise on this. We suggest this remains eligible for the RHI, with reviews in the future if the number of installations significantly increases and warrants attention. Signalling that government support to biogas deployment in the future will be linked to holistic benefits, including air quality as well as carbon, could help ensure technological development goes in the right direction. In any case, there is a need to monitor air quality around biogas installations to improve the evidence base to support future policy.

**6 Should existing biomass boilers installed under the RHI be required to have regular maintenance checks?**

Yes

**Please provide any available evidence in support of your response:**

Yes, very much. CIBSE is a strong advocate of incentives that encourage good maintenance and operation. This would have benefits not only in terms of air quality, but very likely also others such as efficient operation and safety.

In particular, whilst there are not the same dangers of explosion as with gas fuelled combustion appliances, there are potentially lethal hazards associated with biomass fuel stores. Biomass heating installations are also inherently more complex than gas fuelled appliances, and so need regular maintenance to optimise performance. For these reasons biomass installations supported by the RHI should be required to have an annual service.

**7a Do you have any other proposals on how to minimize the air quality impacts of biomass in the RHI? If so please provide further details here.**

**Proposals to minimise AQ impacts of biomass in RHI:**

Beyond requirements for maintenance recommended under question 6, we think more attention could be paid to fuels, as these are crucial in the emissions of an installation (as identified by the Clean Air Strategy and quoted in this consultation). We think options should be reviewed to encourage biomass fuels conducive to better air quality, for example:

- Grading the RHI depending on the type of biomass fuel.
- Introducing quality (including moisture content) requirements within the Biomass Suppliers List (BSL). The current BSL considers sustainable sourcing issues but not fuel quality itself.
- Carrying out emissions tests on installations; this is typically done on large installations as part of environmental permits, but not on smaller scale installations. To minimise the burden on the scheme, this could be a system of randomized tests, common enough that all installations would think it is possible they would be subject to it at some point. These tests would be useful to spot a number of issues including fuel and maintenance. Should fuel moisture content be found that led to high emissions, but it was shown that the owner had sought to buy low moisture content fuel in the first place, attention could be drawn to the storage and transport stages which could have affected the moisture content, in order not to unfairly penalise the RHI installation owner.
- Ensuring that fuel issues, including storage which could affect moisture content, are well covered in the requirements for becoming and remaining an RHI accredited installer.

**7b Are there any other issues you wish to raise with respect to RHI support for biomass in urban areas? If so please provide further details here.**

**Any other issues you wish to raise?:**

AS PER 7A

**Assessment of impacts**