

# HOW TO PREPARE FOR THE OFGEM SUSTAINABILITY AUDIT



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RHI and RO  
Sustainability Audit



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This advice note is to help your company prepare for the Ofgem Sustainability Audit that must be conducted in accordance with ISAE 3000 (Revised).

### **Who we are**

EnviroSense has extensive experience in conducting the Ofgem Sustainability Audit within the biomass sector and are a leader. With widespread experience of writing these reports we are confident in their clarity, accuracy and usefulness. This allows for efficient approval by Ofgem as well as a valuable historic record for future audits.

### **Planning ahead – when is the audit due?**

Timescales that installation owners (Operators) and managers need to be aware of are:

#### Renewables Obligation Order 2015

- 30 June for solid wood and biogas installations
- 31 May for installations using bioliquids

#### Renewables Heat Incentive 2015

Rather than a fixed date for all installations, the RHI requires an annual sustainability audit report to be submitted within 3 months of the anniversary of your date of accreditation. For example, if your accreditation date is 10 October, your audit report is due annually within 3 months of 10 October, i.e. by the 10 January and must cover the 12-month period from 10 October to the 9 October the following year.

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The best approach is to have a safe margin from the submission date of the report should any fuel and sustainability data submissions require amending, or if further information is required to complete the audit report.

EnviroSense want to ensure that when your report is sent into Ofgem it is without any errors or issues. We strongly advocate planning the audit well in advance of the report submission date. Should any errors or issues arise these can be addressed without unnecessary pressure.

## **What needs to be verified?**

We will verify that your installation is:

- Complying with your Fuel, Measurement and Sampling Questionnaire (FMSQ) that is a condition of accreditation.
- Managing the supply and receipt of fuels to the installation and showing these have chain of custody and are not from an unknown supplier and origin.
- Fuels / feedstocks are collated into consignments and feedstock classifications appropriately.
- Reporting either quarterly or monthly tonnages, gas quantities or litres of renewable fuels accurately.
- Reporting the Gross Calorific Value (GCV) accurately if this is applicable to your fuel.
- Not incorrectly including fossil fuels use in reporting of heat or electricity generation to Ofgem as this must be deducted from claims.
- Reporting contamination values accurately based on robust data (fuel test records) if this is applicable to your fuel.
- Reporting if the land criteria had been met if this applicable to your fuel.
- Reporting greenhouse gas emissions (gCO<sub>2</sub> per MJ) of each consignment used in heat and electricity generation.
- The fuels used are compatible with the heat and electricity generation reported (this correlation is less accurate with anaerobic digestion plants).
- If the installation has been in operation for every quarter or month in the reporting period.
- If records are complete and based on robust information has been used and not tenuous information.
- If the Operator has control over the data and measures in place to prevent fraud or notable errors in reporting data to Ofgem.

## **Five staged approach**

After agreeing the engagement letter and fees to perform the work, there are five important stages. Mostly notably, preparing and sending information in an evidence pack before the onsite audit can pre-empt any issues that may be identified at the onsite audit and allow time for these to be addressed.

1. Prepare and send an evidence pack to EnviroSense (see below).
2. Discuss the findings of the initial review with EnviroSense and agree (a) if any extra information is required at the onsite audit and (b) what amendments to fuel and data submissions could be required.

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3. Ensure a senior person is available for the audit (Plant Manager or similar).
4. Agree any findings at the end of the onsite audit and be prepared to make amendments on the RHI or RO register if necessary.
5. Check and approve the report prior to sending this to Ofgem if reporting under the RO, or uploading on the register if reporting under the RHI.

## **The evidence pack**

The following table provides an indication of the evidence required. As stated, this is best sent in advance of the audit to enable EnviroSense to conduct an initial review.

- The fuel and sustainability data reported to Ofgem for the period downloaded from the RO or RHI register.
- The installations Fuel Measuring and Sampling Questionnaire (FMSQ).
- If applicable, a description of the processes, systems or standard procedures you use to generate your relevant sustainability information (e.g. the carbon calculator, mass balance system).
- If you have them readily available, a plant schematic or plan of the installation.
- Spreadsheets or equivalent records used for calculating the monthly or quarterly amount of fuel used in heat or electricity generation.
- Spreadsheets or equivalent records of fossil fuels used, if applicable, in the electricity and heat generation of the installation.
- If a biogas fuelled station under the RO then the Apportioning Tool records for each month. Under the RHI the Apportioning Tool is available for use and if feedstocks are more than one consignment then the auditor will require records to show the apportioning of gas quantities to consignments and feedstocks.
- If a biogas fuelled station any biogas yield feedstock tests if these are used in calculating fuel and sustainability information.
- Contamination and GCV test records for fuels if applicable.
- Greenhouse gas emissions calculations if applicable, using either the B2C2 calculator or other means. If the installation is using crops as a feedstock then farming records indicating the previous land use prior to January 2008, the application of fertilisers and digestate and how farming fuel use is calculated.
- Any evidence to indicate the land criteria has been met if applicable to the fuels used (BSL registered, FSC or PEFC certified or otherwise).
- Equipment calibration certificates for weighbridges, gas analysers, telehandlers and anything used to measure data reported to Ofgem as specified in the FMSQ.

## **Preparing for the onsite audit**

When the auditor visits your installation this should be a straightforward audit since any preliminary findings from the evaluation may have been addressed. We will need to verify several important aspects such as:

- The installation is operating in accordance with its FMSQ.
- No other undeclared feedstocks and different consignments are being used as a fuel.
- Feedstock receipt, origins, supply and use records are available onsite.
- Records to show the use of fuels / feedstocks.

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- Any applicable farming records for the land use and cultivation are available.
- How fossil fuels use (if applicable) is prevented from being burned when generating heat or electricity, or how is use is removed from ROCs or RHI claims.

**Contact us if** you have any questions on how to prepare for the Ofgem Sustainability Audit