



Non-Domestic Renewable Heat Incentive (RHI) Biomass & Biomethane Sustainability

Biomass Sustainability

In July 2012 Government consulted on proposals to introduce requirements for sustainable biomass in the RHI scheme, including a minimum 60% greenhouse gas (GHG) emission saving (relative to the EU fossil heat average) and land criteria. We confirmed this [policy](#) in February 2013.

In December 2013 we published a [policy update](#) setting out timings for implementation and stated that sustainability criteria for all scheme participants may need to be updated in line with emerging evidence on the calculation of GHG (i.e. sustainability criteria would **not** be grandfathered under the RHI).

The biomass sustainability RHI regulations came into force on 5 February 2015, with the obligation on RHI participants to meet the sustainability requirements from the 5 October 2015. This provides additional time for participants and the supply-chain to understand the requirements and achieve compliance.

Biomethane Sustainability

The policy on sustainability applies to all forms of biomass, including that used to produce biomethane from biogas in the non-domestic RHI. The approach to setting the GHG savings target has been designed to be consistent with the approach recommended by the European Commission's 2010 [report](#).

Our February 2013 publication set out the biomass sustainability policy as follows:

"The GHG target will be that [solid biomass or biogas/biomethane](#) will have to achieve 60%

GHG savings compared to the GHG emissions of the EU fossil heat average; this equates to [lifecycle](#) emissions of less than or equal to 125.28kg CO₂ equivalent per MWh [34.8gCO₂e/MJ] of [biomass heat generated](#)."

Biomethane producers are paid on the basis of energy injected into the grid, rather than biomass heat generated. To calculate lifecycle emissions per megawatt hour (MWh) of biomass heat generated, a conversion efficiency value would need to be assumed and defined in the regulations. We have not formally published or consulted on this proposed value to date.

When biomass sustainability becomes a requirement of the RHI we will **not** initially require biomethane producers to take end-use efficiency into account when calculating their life-cycle GHG savings, i.e. **they will need to produce life-cycle GHG emissions of 34.8gCO₂e/MJ or less at the point of injection**.

A number of other issues have been raised about how best to assess GHG savings associated with biomethane production and use. In particular, a recent EC 'state of play' [publication](#) on solid and gaseous biomass sustainability suggests a good practice standard of 70% GHG savings against a natural gas comparator. This would equate to 78kg CO₂e per MWh [**21.7gCO₂e/MJ**] of biomethane injected into the grid.

We therefore intend to work with industry and other stakeholders to further develop RHI sustainability policy for biomethane plants supported under the RHI.