

Appendix A: Glossary

Term	Definition	Source
Manufactured solid fuel	Any solid fuel made from coal, wood, plant-derived materials, waxes or petroleum products, mixed with other ingredients.	Selling manufactured solid fuels for domestic use in England - GOV.UK
Four governments	The Northern Ireland Executive, Scottish Government, UK Government and Welsh Government.	
Certified fuel	A manufactured solid fuel that is compliant with the Air Quality (Domestic Solid Fuels Standards) (England) Regulations 2020, and meets the following emission limits: i. contains less than 2% sulphur (by dry ash weight with a 95% confidence limit); ii. an average smoke emission rate of less than 5 grams per hour when tested to the standard testing method of BS 3841.	Selling manufactured solid fuels for domestic use in England - GOV.UK
Uncertified solid fuel	Solid fuels not compliant with the Air Quality (Domestic Solid Fuels Standards) (England) Regulations 2020.	
The Air Quality (Domestic Solid Fuels Standards) (England) Regulations 2020	Legislation introduced in England, substantively coming into force in May 2021, which: i. restricts the sale of wet wood for domestic burning; ii. limits the emission of sulphur and smoke from manufactured solid fuels; and iii. phases out the sale of traditional house coal.	The Air Quality (Domestic Solid Fuels Standards) (England) – Opinion of the Regulatory Policy Committee, not the regulations themselves The Air Quality (Domestic Solid Fuels Standards) (England) Regulations 2020 (Reworded)
Clean Air Order 1981	An order establishing a comprehensive statutory regime in Northern Ireland for the control of smoke, grit, dust and related emissions from building, furnaces and industrial plants.	Clean Air (Northern Ireland) Order 1981 (Reworded)
Environment and Northern Ireland Order 2002	An order establishing a statutory framework for pollution control, air quality management and waste regulation in Northern Ireland. Under this order, local councils have a statutory obligation to carry out an assessment of their local air quality and designate AQMAs.	The Environment (Northern Ireland) Order 2002 Air Quality Mid and East Antrim Borough Council (Reworded)
District Councils (DCs)	Local authorities in Northern Ireland responsible for several local services and functions, including air quality.	LAQM - Northern Ireland Air (Reworded)

Smoke Control Areas (SCAs)	An area where people and businesses must not: i. emit smoke from a chimney; or ii. buy or sell unauthorised fuel for use in a smoke control area unless it is used in an 'exempt' appliance (appliances which are approved to use in smoke control areas).	Smoke Control Area
Air Quality Management Areas (AQMAs)	Areas designated by local authorities across the UK in which national air quality objectives are not likely to be achieved, triggering the requirement for an action plan to improve air quality. This area could be just one or two streets, or it could be much bigger.	Air Quality Management Areas (AQMAs) - DEFRA UK Air - GOV.UK
Environmental Protection Agency (EPA) (Ireland)	An independent public body established under the Environmental Protection Agency Act 1992, responsible for protecting the environment in Ireland. The EPA provides environmental data, assessments and evidence to inform decision making, and implements regulation and environmental compliance systems.	Who we are Environmental Protection Agency (Reworded)
HETAS	Heating Equipment Testing and Approvals scheme – A non-profit organisation appointed by Defra to manage the Ready to Burn scheme for manufactured solid fuels.	HETAS appointed by Defra to run Ready to Burn scheme for manufactured solid fuels - HETAS
Ready to Burn (RTB MSF)	Manufactured solid fuels that are assessed in meeting sulphur content and smoke emissions standards and are therefore granted certification by HETAS.	Ready to Burn Administered by Woodsure on behalf of Defra
Parent fuel	A fuel produced at source by the original source applicant to HETAS. Of around 200 fuels on the database, around 15 are parent fuels.	Stakeholder meeting
Child fuel	Fuels traded by third party suppliers, often with rebranding of a parent fuel.	Stakeholder meeting
Wet Wood	Wood with a moisture content of more than 20%.	New legislation for wood and manufactured solid fuels - HETAS
Ovoids	A manufactured solid fuel formed into an oval shape.	Ready to Burn (Reworded)
Briquettes	A manufactured solid fuel formed into a small block.	BRIQUETTE English meaning - Cambridge Dictionary (Reworded)
Petroleum coke (Pet coke)	A carbon-rich byproduct of oil refining, typically used as the primary raw material in manufactured solid fuels.	Self-written using various sources
Anthracite	A hard, compact coal, characterised by its high purity level and low smoke emission, typically used as a supplementary material in manufactured solid fuels.	Self-written using various sources
Bituminous coal	A soft, abundant coal, characterised by producing a bright flame and a significant	Self-written using various sources

	volume of smoke when burnt, typically used as a supplementary material in manufactured solid fuels.	
Binders	An additive used in the production of solid fuels that allows fine powders, such as coal, biomass, or mineral fines, to stick together under pressure and form a stable, solid briquette or ovoid.	Binder Guide for Industrial Briquetting, Ore, Sludge, Dust MAXTON (Reworded)
Particulate matter	Everything in the air that is not a gas, consisting of a wide variety of chemical compounds and materials, some of which are toxic. When reporting UK emissions, particulate matter is classified according to particle size: PM ₁₀ refers to particles smaller than 10 micrometres in diameter, while PM _{2.5} refers to finer particles smaller than 2.5 micrometres.	Emissions of air pollutants in the UK – Particulate matter (PM10 and PM2.5) - GOV.UK (Reworded)
Smoke emissions	The release of smoke during combustion, measured as a rate of grams per hour of burning for regulatory purposes.	Self-written using various sources
Burning stoves	Appliances used for the combustion of solid fuels, including stoves, fireplaces and furnaces.	Clean Air (Northern Ireland) Order 1981 (Reworded)

Appendix B: Legal context

B.1 The legislative framework is complex and varies across the UK. This appendix covers the following areas:

- (a) Air quality control
- (b) The regulations
- (c) Manufactured solid fuels
- (d) Enforcement of domestic air quality regulations
- (e) Interactions between the MAPs and air quality regulations.

Air quality control

B.2 Parts 1 and 3 of the [Clean Air Act 1993](#) and Part IV of the [Environment Act 1995](#), together with regulations made under those Acts, are the main legal framework for controlling air quality in England, Scotland and Wales. In Northern Ireland equivalent provisions are in the [Clean Air \(Northern Ireland\) Order 1981](#) and Part 3 of the [Environmental Better Regulation Act \(Northern Ireland\) 2016](#).

B.3 A major feature of control of air quality across all four nations is through Smoke Control Areas (SCAs). Local authorities in England, Wales and Scotland, and district councils in Northern Ireland (NI) have power to declare some or all of their area an SCA.¹ In England and Wales, the Secretary of State, and in Scotland, the Scottish Environment Protection Agency, also has power to direct local authorities to make an SCA order.²

B.4 It is prohibited within an SCA for occupiers of buildings to emit smoke from a chimney,³ for persons to acquire or use unapproved solid fuel,⁴ and for persons to supply, sell or offer unauthorised fuel.^{5, 6} However, it is a defence to prove that the alleged emission of smoke was not caused by the use of any fuel other than an

¹ [Clean Air Act 1993](#), Section 18 (England, Scotland, Wales); [Clean Air \(Northern Ireland\) Order 1981](#), Article 17 (Northern Ireland).

² England and Wales - [Clean Air Act 1993](#), Section 19.

³ Section 19A [Clean Air Act 1993](#) (England); Section 20(1) [Clean Air Act 1993](#) (Wales and Scotland).

⁴ Section 19B(1) of the [Clean Air Act 1993](#) (in England) and Section 19F of the [Clean Air Act 1993](#) (in Wales) prohibit the acquisition of unapproved solid fuel for use in a building, unapproved fireplace, or unapproved fixed boiler in an SCA in England or Wales.

⁵ Section 19B(4) of the [Clean Air Act 1993](#) (in England) and Section 19F of the [Clean Air Act 1993](#) (in Wales) prohibit offering unapproved solid fuel for sale by retail where the fuel is to be taken away by a purchaser, and failing to take reasonable steps to notify potential purchasers that it is an offence to acquire that fuel for use in a building, unapproved fireplace, or unapproved fixed boiler in an SCA.

⁶ Section 19B(5) of the [Clean Air Act 1993](#) (in England) and Section 19F(1)(d) of the [Clean Air Act 1993](#) (in Wales) prohibit selling any unapproved solid fuel by retail for delivery by that person, or on that person's behalf, to a building to which a smoke control order applies, or premises in which there is any fixed boiler to which such an order applies. In Northern Ireland [The Smoke Control Areas \(Sale or Delivery of Unauthorised Fuel\) Regulations \(Northern Ireland\) 1998](#) prohibit selling by retail or delivering in the course of retail sale any solid fuel other than an authorised fuel.

authorised fuel;⁷ or to prove that the accused person believed and had reasonable grounds for believing that the building to which the fuel was delivered was not one to which the smoke control order in question applied, or that the fuel was acquired for use in a fireplace that was, at the time of the delivery, an approved fireplace.⁸

B.5 For these purposes, approved fuels are those fuels included in the following lists:

- (a) **England** - [Authorised/Certified Fuels for England – Clean Air Act Data Entry System](#);
- (b) **Wales** - [Authorised/Certified Fuels for Wales – Clean Air Act Data Entry System](#);
- (c) **Scotland** - [Authorised/Certified Fuels for Scotland – Clean Air Act Data Entry System](#);
- (d) **Northern Ireland** - [Authorised/Certified Fuels for N. Ireland – Clean Air Act Data Entry System](#).

The regulations

B.6 [The Air Quality \(Domestic Solid Fuels Standards\) \(England\) Regulations 2020](#) (the DSF Regulations) control the sale in England of solid fuel for domestic use. The DSF Regulations prohibit the supply and sale of bituminous coal (house coal) and of wet wood in volumes under 2m³. MSFs must be authorised as complying with limits on sulphur content and smoke emissions. Local authorities enforce these requirements and can issue fixed penalty notices or pursue court action.

B.7 The DSF Regulations extend the system of control of air quality by prohibiting emissions of smoke and the fuel that can be used for burning in SCAs. The DSF Regulations form part of the UK Government's strategy for securing the implementation of international agreements relating to the quality of air.⁹

B.8 Before EU Exit, UK controls on air quality were made in accordance with EU law. The UK is no longer a member of the European Union, but the UK has obligations as regards environmental principles under the Withdrawal Agreement¹⁰ and much of the relevant EU law has been retained in the UK as assimilated law.¹¹

⁷ The [Clean Air Act 1993](#), Section 20(4).

⁸ The [Clean Air Act 1993](#) Section 19B(5) in England, the [Clean Air Act 1993](#) Section 19F(5) in Wales

⁹ See Section 87(1) [Environment Act 1995](#) and Part IV of that Act; also, the Gothenburg Protocol 1999 ([Protocol to Abate Acidification, Eutrophication and Ground-level Ozone | UNECE](#)).

¹⁰ See the European Union (Withdrawal Agreement) 2018, Section 16 (now repealed as being spent).

¹¹ For example, [The National Emission Ceilings Regulations 2018](#), setting UK emission limits including limits for SO₂ and for PM_{2.5} and implementing EU Directive 2016/2284/EU relating to national emission ceilings for certain atmospheric pollutants.

- B.9 Environment policy is a devolved matter and Part 1 of the [Environment Act 2021](#) requires the Secretary of State to set long term environmental targets for England. The devolved governments have each published plans and made legislation to set targets for improving air quality and reduce emissions.¹² England, Wales and Scotland have each set a target of achieving a PM_{2.5} concentration limit of 10µg/m³, although the timeframe for doing so differs between the nations, and NI has set a limit for PM_{2.5} of 25µg/m³.¹³

Manufactured solid fuels

- B.10 In England, the DSF Regulations have been made to expedite compliance with the PM_{2.5} limit target. The DSF Regulations have two aims:
- (a) 'to phase out the supply of the most polluting fuels used in the home. These fuels are traditional house coal and wet wood, or wood with a moisture content of more than 20% when sold in units under two cubic metres'; and
 - (b) '[to introduce] sulphur and smoke emission limits for manufactured solid fuels.'¹⁴
- B.11 The DSF Regulations prohibit the supply throughout England (not only in an SCA) of a manufactured solid fuel that is – (a) not authorised fuel¹⁵; (b) not one of the 290 certified manufactured solid fuels in the [Authorised/Certified Fuels for England](#) list maintained by the Secretary of State; and (c) not accompanied by (i) the relevant information as to certification; and (ii) the specified logo.¹⁶
- B.12 A person (e.g. a supplier) who contravenes any of these three prohibitions commits an offence and may be fined if convicted.¹⁷
- B.13 For these purposes 'Manufactured solid fuel' is defined as: '*a fuel manufactured from coal, wood, plant-derived materials, waxes or petroleum products with other ingredients, for the purposes of combustion in domestic premises in England*'¹⁸ other than exempt fuel.¹⁹

¹² England - [Environmental Improvement Plan \(EIP\) 2025 - GOV.UK](#); Wales - [Clean Air Plan for Wales: Healthy Air, Healthy Wales | GOV.WALES](#); Scotland - [Cleaner Air for Scotland 2 - Towards a Better Place for Everyone - gov.scot](#); Northern Ireland - [Environmental Improvement Plan for Northern Ireland](#) and [consultation-on-solid-fuel-burning-january-2026.pdf](#).

¹³ In England by 2040 - [The Environmental Targets \(Fine Particulate Matter\) \(England\) Regulations 2023](#) regulation 4; in Wales by 2035 - [The Air Quality Targets \(Fine Particulate Matter\) \(Wales\) Regulations 2026](#) regulation 4; in Scotland by 2020 - [The Air Quality \(Scotland\) Amendment Regulations 2016](#) reg 2; and in Northern Ireland by 2020 - [The Air Quality Standards Regulations \(Northern Ireland\) 2010](#) Schedule 2, para 1.

¹⁴ [Hansard col 117 - draft Air Quality \(Domestic Solid Fuels Standards\) \(England\) regulations](#).

¹⁵ 'Authorised fuel' is fuel certified not to have: (a) a sulphur content of 2% or more calculated on an ash-free dry basis; and (b) the emission of smoke at a rate of five grams or more an hour (regulation 11(9) of the [DSF Regulations](#)).

¹⁶ [The DSF Regulations reg 10\(4\)](#).

¹⁷ The [DSF Regulations, reg 10](#).

¹⁸ The [DSF Regulations, reg 9](#).

¹⁹ 'Exempt fuel' is defined as *any of the following— (a) coffee logs; (b) olive logs; (c) wine logs; or (d) fuels where the majority of the fuel comprises— (i) wheat husks; (ii) straw; (iii) miscanthus; (iv) bamboo; or (v) compressed food waste*.

- B.14 Manufacturers of fuel certified under the DSF Regulations must supply it with the Ready to Burn logo specified in Schedule 1 to the Regulations.²⁰ Manufacturers supplying fuel which was in the list kept by the Secretary of State prior to the coming into force of the Regulations may use the Ready to Burn logo for as long as it remains on that list.^{21 22}

Figure B.1A Ready to Burn logo



Enforcement of domestic air quality regulations

- B.15 Enforcement of air quality legislation is principally led by the Trading Standards teams and environmental health teams of local authorities, although their responsibilities differ. Trading Standards teams are typically focused on metrology (weights and measures) and may not have specialist expertise in fuel composition, smoke control rules or online solid fuel sales. In England, Trading Standards officers do, however, undertake some checks for the Ready to Burn logo being present on solid fuels bags. However, fuels which prior to the DSF Regulations coming into force were included in the list of authorised fuels kept by the Secretary of State are entitled (but not required) to show the Ready to Burn logo.²³
- B.16 Environmental health teams may respond to smoke complaints, but stakeholders suggested that their role is often framed around air quality management and providing advice rather than formal prosecution. This means that enforcement outcomes can differ across councils, even where the underlying market issue is similar.
- B.17 A newspaper article, relying on Freedom of Information requests, states that in 2025, despite 15,195 complaints being made to local authorities in England, no prosecutions for illegal domestic wood burning were made.²⁴

²⁰ [The DSF Regulations reg 10\(3\)\(b\)](#)

²¹ [The DSF Regulations reg 11\(8\)](#)

²² [The DSF Regulations reg 11\(6\).](#)

²³ [The DSF Regulations reg 11\(8\)](#)

²⁴ [The Guardian, 23 October 2025.](#)

- B.18 The reasons for the apparently limited enforcement of air quality controls may include lack of relevant evidence needed for a successful prosecution (complaints in themselves are likely to be insufficient).
- B.19 In the case of supply of unauthorised solid fuel, the fact that the prohibitions on sale in an SCA are not absolute but are subject to a number of statutory defences may also make prosecution difficult. For example, the accused person may claim reasonable grounds for believing that the building to which the fuel was delivered was one not subject to a smoke control order, or was acquired for use in an approved fireplace, or that a warning notice was sufficient to notify potential purchasers that it is an offence to acquire that fuel for use in a building, or unapproved fireplace, in an SCA.
- B.20 To that extent the DSF Regulations may be easier to enforce. However, as the DSF Regulations apply only in England, the MAPs may apply to allow sale of unauthorised fuel imported from other parts of the UK where that fuel could lawfully be sold in that other part of the UK. In addition, the DSF Regulations will not apply to unauthorised fuel sold to purchasers outside England.

Interactions between the MAPs and air quality regulations

- B.21 Part 1 of the [United Kingdom Internal Market Act 2020](#) (UKIMA) promotes the functioning of the UK internal market for goods by establishing market access principles (MAPs) of mutual recognition and non-discrimination to counter barriers to trade within the UK internal market.
- B.22 The principle of mutual recognition is particularly relevant in the current context. This establishes that goods which have been produced in, or imported into, one part of the United Kingdom and can be sold there without contravening any relevant requirements that would otherwise apply to their sale.²⁵
- B.23 The prohibitions in the DSF Regulations apply in England (but not in the rest of the United Kingdom) to all supplies of manufactured solid fuel, wood and coal irrespective of whether supply of these goods is permitted or not permitted in other parts of the UK and irrespective of whether the supply is for use inside or outside an SCA.
- B.24 This raises the possibility that imports to England of solid fuel which is permitted to be supplied in other parts of the UK, but which does not comply with the DSF Regulations, may nevertheless seek to rely on the mutual recognition of goods principle in Part I UKIMA. In such a case the importer would rely on the MAPs to

²⁵ Section 2(1) [United Kingdom Internal Market Act 2020](#).

supply non-authorised solid fuel in England free from the prohibition in the DSF Regulations which would otherwise apply.

- B.25 This creates a risk that the application and benefits of the DSF Regulations to reducing PM_{2.5} and SO₂ emissions in England may be undermined. This is due to the supply of manufactured solid fuel from other parts of the UK, which would otherwise be prohibited in England, being made lawful by relying on the mutual recognition principle of the MAPs. The extent to which this risk applies in practice and possible mitigations are one of the key issues for this review.

Definitions

- B.26 Throughout this report, when we refer to authorised fuels or certified MSFs, we mean fuels that are authorised by being in the list kept by the Secretary of State under the Clean Air Act, or fuels that have been certified under the DSF Regulations.

Appendix C: Data methodology

Data outputs and data inputs

- C.1 This appendix sets out the methodology used to develop the quantitative estimates used in the report, specifically:
- (a) Estimated consumption of MSF at the UK and sub-national level;
 - (b) Estimated production of MSF at the UK and sub-national level;
 - (c) Volumes of uncertified MSF sold in England; and
 - (d) Cross-border movements of MSF for domestic use within the UK.
- C.2 All estimates are for MSF for domestic use. Our estimates should be interpreted as volumes for FY 2025/26.
- C.3 There is limited data available regarding the supply and demand for MSF in the UK and no single dataset that comprehensively reports consumption, manufacturing, and cross-border trade of MSF within the UK. There is also no public data that distinguishes between certified and uncertified MSF. We therefore gathered a range of quantitative information from public and proprietary datasets, industry estimates and sales data from MSF manufacturers and distributors.
- C.4 We use data from the following datasets:
- (a) [HMRC UK overseas trade data; Harmonised System code HS270120; 2025](#)
 - (b) [DFT UK port traffic data; 2024](#)
 - (c) [NAEI greenhouse gas emissions data; 2024](#); latest results with sub-national breakdowns provided on request to the CMA;
 - (d) [HMRC Climate Change Levy revenue data; 2025](#); disaggregated results for 'Solid and other fuels' provided on request to the CMA;
 - (e) [The Digest of UK Energy Statistics \(DUKES\)](#)

Methodological challenges

- C.5 In public datasets, MSF is often captured under broader categories such as 'coal' that may include products such as bituminous coal, petroleum coke (pet coke) or anthracite. Definitions and categories also vary, which means that compiling and comparing aggregated datasets can be unreliable and produce wide ranges. Moreover, official statistics providers have told us that official figures rely on various, sometimes layered, assumptions which limits accuracy. The granularity of

self-reported private data used in the analysis is variable, which has made direct comparisons between private data sets difficult. Furthermore, manufacturers told us that they typically do not know whether the end consumer is a business or a household; we have had to adjust the manufacturers' reported production figures accordingly.

- C.6 Estimating cross-border internal trade poses additional challenges as wholesalers play a significant role in this trade and we have only limited data about wholesalers' activities. As well as moving MSF across the UK's internal borders, some wholesalers may be exporting and/or importing internationally. For these reasons there may be a small amount of over- or under-counting in our estimates for total production and consumption within the UK (equivalent to not more than 6 percentage points based on the most recent import/export statistics).
- C.7 The data period for the most recent data is not consistent across private and public datasets with some reporting FY 2025/26 and others CY 2025. Some official statistics are only available for CY 2024. We have used the most recent data available in each case.
- C.8 For these reasons we have been careful not to seek to quantify effects with a level of precision that the underlying data cannot support. For example, we have sometimes estimated a range for the relevant estimates. As with all estimated data, the ranges produced are themselves a function of the underlying assumptions that we have made.

Estimates

General approach

- C.9 Our approach takes the following steps:
- (a) We estimate total UK consumption and then we apportion that total to each of the four nations.
 - (b) We estimate manufacturing output at the UK level, and separately for England and NI. We factor in international exports and imports.
 - (c) We compare the difference between production and consumption for each of the four nations.
 - (d) We estimate the consumption in England that is imported MSF.
 - (e) We estimate cross-border trade in uncertified MSF trade (and therefore the origins of the uncertified fuel in consumed in England).
- C.10 We set out these estimates in turn below.

Consumption estimates

- C.11 We used estimates from manufacturers for the total volume of MSF consumption in the UK. We compared these with the estimates from DUKES and the NAEI for total consumption. These figures produce a central estimate of 305,000 tonnes for total UK consumption of MSF (for domestic burning) in FY 2025/26.

Sub-UK consumption estimates

- C.12 We estimate MSF consumption in each UK nation by apportioning total MSF consumption in the UK using the NAEI.
- C.13 The NAEI provided the CMA with estimated domestic consumption of MSF at the UK and sub-national level. We use the NAEI data to understand the proportional consumption of MSF at the sub-national level.
- C.14 We apply an assumption that consumption in 2025 is the same as consumption in 2024, as the most recent NAEI data covers 2024.
- C.15 On this basis, we estimate 74.7 per cent of consumption is in England, 6.3 per cent is in Wales, 11.5 per cent is in Scotland and 7.5 per cent is in NI. Accordingly, we estimate that 228,000 tonnes of MSF were consumed in England in 2025; 19,000 tonnes in Wales; 35,000 tonnes in Scotland; and 23,000 tonnes in NI.

Production (manufacturing) estimates

- C.16 There are three major manufacturers in England, three in NI and one manufacturer in the Republic of Ireland (ROI) that are active in supplying the UK either directly or indirectly. We interviewed and obtained data from six of these manufacturers and collected a range of sales information from them.
- C.17 We refer to UK-based production as either self-reported sales by UK-based manufacturers or the sum of self-reported sales by UK-based manufacturers and net international trade (imports – exports).
- C.18 To produce an estimate of total domestic manufacturer sales at the UK level, we use as our starting point sales data provided by six UK- and ROI-based manufacturers. As discussed in paragraph C.3, the quality of this data is variable, with the most complete data at the UK and GB levels, and more limited data availability at the sub-national level. We received limited data on manufacturer production in NI, so we estimate a lower bound using the sum of estimated production in NI and NI MSF exports.
- C.19 This produces an estimate of 317,000 tonnes of MSF produced in the UK. We then make an adjustment for international trade. We calculated net international trade using the sum of international import (17,000 tonnes) and export (25,000

tonnes) volumes for code HS270120 in the HMRC overseas trade dataset (see paragraph C.4(a)). Net exports from the UK represent 8,000 tonnes, producing an overall estimate of UK manufacturing including net-exports of 309,000 tonnes.

- C.20 This bottom-up estimate of MSF production (plus net imports and exports) is a sense-check on our top-down consumption estimates. Our estimate for manufacturing production plus net-imports (309,000 tonnes) is close to the top-down consumption estimates (305,000 tonnes).

Comparing consumption and production

- C.21 More MSF is consumed in England than England-based manufacturers report selling to customers based in England (we do not report the production figures, due to commercial confidentiality). International imports to England (7,000 tonnes) cannot account for all the difference between consumption and production in England. Similarly, we estimate NI is a substantial net exporter of MSF to other UK nations (again, we suppress the figures for commercial confidentiality).

Uncertified fuels domestic consumption in England

- C.22 We estimate the proportion of English sales that are uncertified MSF by combining our estimates of excess consumption in England with industry estimates of uncertified MSF consumption in England. By excess consumption we mean the volumes consumed in England in excess of the volumes produced by English manufacturers and sold directly to customers in England.
- C.23 Manufacturer production data suggests at least 56,000 tonnes of uncertified MSF were sold in the UK in 2025. At least, 26,000 tonnes were sold in Wales and Scotland, which leaves 30,000 tonnes of known sales unaccounted for. We estimate Wales, Scotland and NI consume 77,000 tonnes of MSF, of which a substantial majority is thought to be uncertified fuel (based on the low volumes of certified fuel sold in these locations from manufacturers who reported sales data).
- C.24 Industry estimates suggest annual flows of uncertified MSF into England from NI-based manufacturers are 5,000 – 20,000 tonnes, and that 15,000 tonnes derive from English manufacturers. The latter involves MSF being handled by wholesalers in Scotland, Wales or NI who then reimport the MSF to England – it is not sold directly by manufacturers.
- C.25 We therefore estimate uncertified MSF with final consumers in England range from 20,000 – 35,000 tonnes, or 9 – 15 per cent of total domestic consumption in England. This is consistent with the existence of consumption in excess of production in England according to our modelling.