
Grown in Britain Woodfuel Standard

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GROWN IN BRITAIN WOODFUEL STANDARD

The Grown in Britain Woodfuel standard is a provenance standard for the licensing of woodfuel originating from timber grown in the United Kingdom - England, Northern Ireland, Scotland and Wales. A key element of Grown in Britain's ambition is to increase the number of existing forests and woodlands which are actively managed to a recognised forest management standard to create a healthier future for our forests and woodlands.

This standard has been designed to increase the visibility of woodfuel produced from home grown timber by licensing woodfuel derived from timber grown in the United Kingdom.

This is the definitive standard setting out the requirements for the licensing of Grown in Britain suppliers to allow woodfuel businesses to use Grown in Britain product claims and labels.

When the Grown in Britain licence is applied to woodfuel it gives assurance of origin through an instantly recognisable label. This Grown in Britain Woodfuel standard aligns itself with the Timber Standard for Heat and Electricity (TSHE) ¹ and provides a guarantee that products originate from timber grown in the United Kingdom.

Grown in Britain fully recognises existing, and well-proven, forest certification schemes such as the Forest Stewardship Council (FSC) and the Programme for Endorsement of Forest Certification (PEFC) schemes and does not wish to compete with or replicate them.

Further guidance on the UK government TSHE is found within the Timber Standard for Heat and Electricity published by the Department of Climate Change and Government forest management criteria. This version of the standard is valid from 15th October 2015.

¹ <https://www.gov.uk/government/publications/timber-standard-for-heat-electricity>

A. Introduction

This standard specifies the requirements for woodfuel producers. The term 'woodfuel' refers to solid fuel that is derived from virgin timber; this includes pre consumer timber. It does not include post-consumer timber.

Business types that can apply for a Grown in Britain licence include, but are not limited to

- Processors
- Wholesalers and retailers

This standard sets out requirements, and the traceability and management control systems required, including:

- Management, procedures, responsibility and record keeping
- Purchasing / receipt and storage
- Material accounting
- Product schedule
- Sales and delivery; output claims
- Use of Grown in Britain label with respect to on-product and off-product labelling

Businesses that do not take legal ownership (i.e. there is no point of sale or onward ownership transfer) do not require a Grown in Britain licence, but may make a request to Grown in Britain for an agreement to use the logo for promotional or educational purposes.

B. Scope including licence categories

In order that woodfuel products may be sold or labelled as Grown in Britain, all virgin wood including pre-consumer wood must originate from timber grown in the United Kingdom. The timber must be sourced from woodlands that meet The Timber Standard for Heat and Electricity (TSHE) sustainable forest management criteria or be deemed sustainable under the Woodfuel Advice Note.

This must be proven through an annually audited system of traceability (or chain of custody) from point of sale or ownership transfer providing the basis for independent verification of product claims through a system of auditing and licensing.

The four key traceability elements for eligible products are:

- UK provenance
- Legally felled
- Virgin timber is sourced from woodlands or forests that are managed to TSHE sustainable forest management requirements or be deemed sustainable
- Existence of an effective traceability system for inputs and outputs

The GiB Woodfuel licence category allows for a mix of timber and timber products from sources with and without approved management plans. The requirements for this category are:

- 100% of the timber is sourced from England, Scotland, Wales or Northern Ireland
- At least 70% of the inputs are from forests or woodlands with a UKFS compliant management plan, be certified by existing forest certification such as FSC or PEFC or deemed sustainable
- The remaining 30% or less must be legal. Proof of legality can be demonstrated through purchasing timber with a Grown in Britain Legal Only licence (GIB-LO), a felling licence, or through the EUTR

The 70:30 balance is calculated through each reporting period which can be up to one year and a Risk Based Regional Assessment can be used to demonstrate this.

C. References

The following documents are relevant to this standard.

References to standard

- The Timber Standard for Heat and Electricity
- CPET Timber Procurement Advice Note (Fifth Edition June 2013)
- CPET Guidance for Growers of Timber in the UK (December 2013)
- Woodfuel Advice Note (DECC, December 2014)
- Grown in Britain Application Form
- Grown in Britain Audit Template
- Grown in Britain Standard
- Grown in Britain label use standard
- GiB Guidance Note for Woodfuel
- Risk Based Regional Assessment: A Checklist Approach published by DECC December 2014

Other references that may be of interest

- UK Forestry Standard (2011)
- Tree Felling – Getting permission (2007)
- UK government Timber Procurement Policy (June 2013)

Other standards that may be of interest

- ISO/IEC Guide 27:1983: Guidelines for corrective action to be taken by a certification body in the event of misuse of its mark of conformity.
- FSC chain of custody standards
- PEFC chain of custody standards

D. Definitions

For the purposes of the Grown in Britain standard and associated documentation the following terms and definitions apply:

Acceptable evidence – this is evidence that is recognised by Grown in Britain as proof of the Grown in Britain custody chain as detailed in the Acceptable Evidence document.

Chain of Custody - a mechanism for tracking Grown in Britain acceptable material from the forest to the finished product to ensure that the wood or wood fibre contained in the product or product line can be traced back to timber that is Grown in Britain.

Controversial sources – These are sources where there is a high risk of activities that do not comply with local, national, or international legislation, in particular relating to the following areas:

- forestry operations and harvesting, including conversion of forest to other uses;
- management of areas with high environmental and cultural values designed and covered by the legislation;
- protected and endangered species, including requirements of CITES;
- health and labour issues relating to forest workers;
- property, tenure and use rights of indigenous peoples;
- payment of taxes and any other ; and
- areas where genetically modified organisms are being used.

Due diligence – An investigation through which the potential acquirer evaluates an input suitability prior to purchase.

Educational – any use of the logo used to promote the products, services, the Grown in Britain brand or organisations that is not specifically attached to products themselves.

Felling Licence – permission given by the regulatory body that trees can be felled and will often include conditions such as restocking. A felling licence may be used to demonstrate legal felling and/or UK provenance of the timber

Finished product – the final product or output(s) produced by the organisations processes that the organisation deems ready for sale to the consumer.

FSC – Forest Stewardship Council.

GIB Licence – this is a five year licence issued to growers, producers and traders of timber products with an annual fee issued by Grown in Britain to the following licence holder categories GIB-F, GIB-FP, GIB-S and GiB-LO conferring permission to make Grown in Britain claims and use the Grown in Britain licence label in compliance with Grown in Britain Label Use Standard, on particular outputs upon receipt of positive audit report findings (after addressing any identified issues).

GIB Woodfuel Licence – this is a five year licence issued to producers and traders of woodfuel products issued by Grown in Britain on receipt of an annual fee. It confers permission to make Grown in Britain claims and use the Grown in Britain licence label in compliance with Grown in Britain Label Use Standard, on particular outputs upon receipt of positive audit report findings (after addressing any identified issues).

Grown in Britain custody chain – the traceability of the documents from the receipt of goods to the sale of products showing that the timber in those goods and products are in compliance with the Grown in Britain Standard.

Ineligible inputs – these are input materials that contribute towards the finished product that are not compliant with the Grown in Britain System Standard.

Ineligible timber/products – these are products in which all or part of the timber within the product is non-compliant with the Grown in Britain Standard.

Inputs – raw materials and other materials that contribute towards the finished product or output.

An input could also be a finished product purchased by a retailer.

Label – Grown in Britain on product and off product label permitted for use by Grown in Britain licence holders. The label consists of the Grown in Britain logo and the licence holder's licence number.

Legal – authorisation based in law.

Licence – See GIB Licence.

Licence holder – an individual or organisation that has been awarded a Licence from Grown in Britain.

Logo – the registered logo of Grown in Britain.

Managed woodlands – woodlands and forests that are managed in accordance with the UK government TPP

70:30 balance – this balance is calculated only for the inputs for GiB-S. It is the proportion of timber that is evidenced as from woodlands managed in compliance with the UK TPP to timber with only legality evidence.

Non-timber forest products – products from a woodland or forest which are not made of timber. Examples include: wild mushrooms, venison, wild garlic, etc.

Non-controversial sources – see controversial sources

Off-product – term for any label or marking that is not attached to a product.

On-product – term for any label packaging or marking that is attached to a product.

Output – Timber or product.

PEFC – Programme for the Endorsement of Forest Certification.

Post-consumer timber – an input that has had a previous product life, which is reused, reclaimed or recycled into a new finished product.

Pre consumer timber – is timber that may or may not have been part of a manufacturing process and may or may not have been produced as a primary product or co product of a lesser value than the primary product. This timber is considered virgin timber and will be required to provide evidence as such.

Primary processors – any processor that transforms raw material (round timber) into products or commodities (for paper includes the chipping/pulp and paper mill stages).

Process – set of interrelating or interacting activities that transforms inputs and raw materials into outputs/products.

Product category – a general description of the product based on a classification/ categorisation system. The definition will include details about the product such as hard or soft wood, form sold and any specified volumes or sizes.

Product schedule – is a list of inputs (raw materials) and outputs (products) used as part of the application and licence process.

Product transformation – where an input product is changed to and sold onwards as another product type (e.g. round timber is changed into wood chips).

Promotional – any claims made to promote the products, services or organisations but are not specifically attached to products themselves.

Raw materials/ inputs – timber at the point where it enters the organisations Grown in Britain custody prior to processing. For example, the finished product of a primary processor will be the raw material for a secondary processor.

Recycled timber– post-consumer timber, for example timber which has been previously used either in buildings, temporary works or other uses and are re-used in such a way that they require reprocessing. This includes reclaimed or reused timber. It does not include Pre-consumer timber (see above)

Sales document – physical or electronic invoice, delivery note, bill of sale or contract of sale that identifies the trading parties and also describes and quantifies the items sold.

Supplier – an individual, company or other legal entity providing goods or services to an organisation.

UKFS – UK Forestry Standard (2011).

UKFS compliant management plan – a management plan that complies with the UK Forestry Standard (2011) approved by the Forestry Commission, Forest Service Northern Ireland or Natural Resources Wales.

UK TPP – UK Timber Procurement Policy.

UKWAS – The UK Woodland Assurance Standard

United Kingdom – England, Northern Ireland, Scotland and Wales.

1. GENERAL REQUIREMENTS FOR FOREST AND WOODLAND OWNERS

1.1 Management, procedures, responsibility and record keeping

- 1.1.1 The licence holder must ensure that timber used for woodfuel production originates from well managed woodlands in the United Kingdom.
- 1.1.2 Well managed is defined in the UK Forest Standard (2011) and evidence of this would include:
 - Existing FSC/PEFC forest management plan
 - Forestry Commission (Scotland or England), Forest Service (Northern Ireland), or Natural Resources Wales approved Management Plan, or assessed as UK Forestry Standard compliant
- 1.1.3 The woodland must be managed, and the timber extracted, in accordance with the UKFS compliant management plan and any associated felling licences.
- 1.1.4 The licence holder must ensure that a written business management 'control system' is in place that defines the responsibility, training, procedures and records to demonstrate compliance with the Grown in Britain standards.
- 1.1.5 Maintain a **Product Schedule in line with that detailed in section 1.2:**
- 1.1.6 If ineligible inputs are received ensure there is compliance with **receipt and storage** as detailed in **section 1.3** of this standard.
- 1.1.7 Ensure there is traceability by maintaining a **product / volume accounting record** system which records all transactions in compliance with **section 1.4** of this standard (including orders, transport documents and invoices) and ensure that all **sales** documents are in compliance with **section 1.5** of this standard.
- 1.1.8 Ensure that there is a full chain of custody to demonstrate traceability to the point of sale.
- 1.1.9 Retain all records required to demonstrate compliance to this standard for at least 5 years.
- 1.1.10 Ensure there is evidence of lawful harvesting, where felling is below the Felling licence threshold or other situations where a felling licence is not required (for example, arboricultural work, hedgerow maintenance, short rotation coppice). Record volumes, where the timber came from, name and address of supplier/land owner, reason why the timber is not derived from an approved felling licence or management plan. The following risks must be assessed with an explanation of how any risks can be mitigated: illegality, governance, forest regulation and any Grown in Britain licence claim is valid. This applies equally to primary and secondary processing products; suitable checks must be carried out to ensure that the timber is from lawful harvesting.
- 1.1.11 The licensed organisation must have a formal complaints procedure in place and evidence that any complaints received have been addressed.
- 1.1.12 The organisation must keep records to demonstrate that the relevant personnel are trained and competent in the outlined management procedures including the validation of Grown in Britain claims and any other relevant documented procedures; these may be new procedures or adapted existing procedures.

1.2 Raw Material and Product schedule

- 1.2.1 For all raw material entering the control system, a Schedule must be maintained which details inputs and outputs.
 - inputs used within the control system

- input and output product claim
 - output products
- 1.2.2 Material category may be identified as e.g. Roundwood, Arboricultural arisings etc.
- 1.2.3 When **purchasing inputs** checks must be in place to demonstrate there is compliance with **receipt and storage** outlined in **section 1.3** of this standard.
- 1.2.4 The product schedule including product names must be defined by the supplier and confirmed as acceptable by the certification body.

1.3 Purchasing, receipt and storage

The licence holder must:

Eligible inputs

- 1.3.1 Only accept into their control system eligible inputs as defined by this standard. All inputs must be checked through the chain of custody to the timber source or another Grown in Britain licensed supplier.
- 1.3.2 Ensure supplier paperwork is checked at point of supply/upon receipt and be in compliance with **section 1.5** of this standard,
- 1.3.3 Demonstrate that all timber inputs comply with eligibility criteria as defined in section 1.1
- 1.3.4 All products must be checked for compliance with the Product Schedule (see section 1.2) and this document is acceptable to Grown in Britain under the licence.
- 1.3.5 If the supplier is not a Grown in Britain licence holder then the licence holder must ensure that checks have been carried out in accordance with section 1.1.10.

Storage

- 1.3.6 Grown in Britain products must remain identifiable in storage,
- 1.3.7 Ensure where there is product transformation as a result of processing steps, the Grown in Britain status is identifiable at each stage of processing,

Non-conforming inputs

- 1.3.8 When supplier's paperwork or Grown in Britain product schedule fails to meet Grown in Britain standards these products must not be entered into the control system and must be rejected or quarantined until the matter is resolved and the product is either accepted or rejected as Grown in Britain.
- 1.3.9 Ensure products are identified, marked as non-eligible and separated from Grown in Britain products or, quarantined (if further enquiries are being made about the products Grown in Britain supply status).

Ineligible timber/products

- 1.3.10 Timber that is grown outside the UK.

Segregation

- 1.3.11 Where ineligible timber/products of similar appearance or specification to Grown in Britain products are sourced, these products must be clearly distinguishable as ineligible at all times. A segregation system must be demonstrated which ensures contamination of eligible and ineligible timber/products cannot occur.

Supplier identification

- 1.3.12 Maintain an up to date record of Grown in Britain licence holders and suppliers.
- 1.3.13 Check Grown in Britain licence holders via the Grown in Britain website <http://www.growninbritain.org> and FSC and PEFC claims must be checked via the relevant online database and record evidence of validation.

On-product labels

- 1.3.14 Ensure that 'on-product' labels of incoming raw material or products are removed prior to onward sale for all non-conforming and ineligible timber/products. For example, where Grown in Britain licensed materials products are purchased and then processed by a different Grown in Britain licensee to transform them into a different Grown in Britain product.
- 1.3.15 If a Grown in Britain licensed product with an existing on-product label is brought into the system as input and it is then transformed in any way, you need to replace the existing on product label with your own.

Monitoring

- 1.3.16 The licence holder must maintain a 12 month balance sheet that tracks the inputs and monitors eligibility criteria throughout to demonstrate that inputs for the GiB products are compliant with the GiB standard and relevant licence category.
- 1.3.17 Monitoring of stock eligibility is the responsibility of the appointed stock manager within the licence holder's organisation and the stock manager must be trained in how to monitor this.
- 1.3.18 The percentage of timber brought into the control system from woodlands managed in accordance with TSHE must be recorded. During each monitoring period this percentage must be reviewed on a regular basis to ensure the 70% requirement can be adhered to by the end of the monitoring period.
- 1.3.19 A 70:30 balance calculation must be carried out. The monitoring period can be 12 months or less but must be defined by the licence holder.

1.4 Material accounting

- 1.4.1 Maintain a product / volume accounting record that records all eligible inputs and outputs.
- 1.4.2 Ensure that the accounting record includes **Purchase** details that links the sourced product to purchase paperwork:
- Supplier name
 - Date of supply/receipt
 - Any Grown in Britain licence claim
 - The Grown in Britain licence number of the product/raw material purchased
 - Unique reference to supply paperwork (i.e. purchase order, delivery or transport reference, sales invoice reference), capable of linking supply documents
 - Purchase quantity (meter cubes or tonnage) defined by licence holder for each product
 - Product category
- 1.4.3 Ensure that the accounting record includes applicable **Sales** details:
- Customer name

- Date of sale
- Unique reference to sale paperwork i.e. sales order/customer purchase order, delivery or transport reference, sales invoice reference), capable of linking to sale documents)
- Sale quantity for each product
- Product category
- Grown in Britain Product claim (GiB Woodfuel)

1.4.4 A licence holder that processes a mix of Grown in Britain and Non-Grown in Britain timber on a single site must ensure that there is traceability of the GiB inputs during processing or product transformation. This does not apply where a licence holder or site exclusively deals with timber which is Grown in Britain timber.

1.5 Sales and delivery; product claims

1.5.1 Retain all records required to demonstrate compliance to this standard for at least 5 years.

1.5.2 Ensure products comply with **Eligible Criteria for outputs**

1.5.3 Ensure that the licence holder definition for each product complies with the Product Schedule submitted to Grown in Britain (see section 1.2).

1.6 Sales documents

All sales documents must include:

1.6.1 Name, address and contact details of the business.

1.6.2 Name and address of the customer.

1.6.3 Date when documents are issued.

1.6.4 The quantity for each product.

1.6.5 The description of each product.

1.6.6 The licence holder's Grown in Britain licence number and claim for each licensed product

1.6.7 As a minimum requirement, *include the licence type and licence number on the sales invoice*; this must also be included on delivery and transportation documents.

1.6.8 Ensure that where delivery or transportation documents are issued, these documents can be linked to the invoice.

1.6.9 Use of the licence with respect to on product and off product labelling shall be in compliance with the Grown in Britain label use standard.

1.7 Use of Grown in Britain label with respect to on-product and point of sale material

1.7.1 Any finished products, with 'on-product' labelling, that are to be resold without any changes must retain their Grown in Britain 'on-product' labels or marks in order for the Grown in Britain claims to be substantiated.

1.7.2 Any use of Grown in Britain 'on-product' labels must comply with Grown in Britain label use standard.

1.7.3 Licence holders may in addition, request to use the Grown in Britain logo for promotional and educational purposes that must first be approved by Grown in Britain.

2 REQUIREMENTS FOR INSPECTIONS AND ISSUING OF A LICENCE

- 2.1 A Grown in Britain applicant must
- 2.1.1 Complete a Grown in Britain application form including Grown in Britain Product Schedule.
- 2.1.2 Consent to Grown in Britain terms and conditions.
- 2.1.3 Undergo an annual audit and assessment by a Grown in Britain approved auditor. The approved auditor list is available on the Grown in Britain website. The inspection report has to be forwarded by the auditor to the applicant.
- 2.1.4 The applicant should formally accept the audit report after which it will be sent to the certification body. The certification body will evaluate and submit a conformity report to the audited company and auditor.
- 2.1.5 The Certification Body will issue the appropriate Grown in Britain licence indicating scope and timber/ product outputs included under the licence.
- 2.1.6 An annual audit by an approved auditor to confirm continued compliance to Grown in Britain standard (no more than 15 months between audits). For licence holders with multi-sites the following rule applies (rounded up to the next whole number):
- $$\text{Number of site audits} = \sqrt{\text{Total number of sites}}$$
- The annual site audits must include the headquarters.
- 2.1.7 Each production facility identified for audit has to be inspected annually by a listed auditor in accordance with the Grown in Britain master checklist.

Guidance on major and minor non-conformities

- 2.2 A minor non-conformance occurs when a Grown in Britain requirement is not met, but without any major consequences. It is a deficiency that likely will not result in the failure of, nor seriously weaken, the Grown in Britain licence claim. The inputs system is not impacted to the extent that it reduces its ability to assure controlled processes or products and therefore meet the Grown in Britain Licence claim. Examples include failure by one or a few individuals to correctly use a procedure, or a single observed lapse in a procedure.
- 2.3 A major non-conformance is when there is an absence or total breakdown in the system to meet the Grown in Britain standard requirements. Essentially, it is a deficiency that will seriously impair the effectiveness of the Grown in Britain management system. Typical examples of a major non-conformance include failure to take corrective or preventive action, not implementing an element of the Grown in Britain standard, not developing or implementing procedures or having many minor non-conformances.
- 2.4 If minor non-conformities are found during an inspection the inspection body sets out a reasonable deadline for corrective measures and these items will be checked at next audit.
- 2.5 When major non-conformities have occurred the certification body may suspend the certificate and order a completely new audit to be conducted after the defects have been corrected. If the new audit also leads to a non-conformity decision, the certification body can revoke the certificate. Major non-conformities are classified as production issues that could influence the status of the products as being Grown in Britain.