

## Chapter 4: Setting Standards, Improving Performance and Cost Control

### 4.1

We agree with the implementation of the biomass sustainability standards. However we think that annual reporting is adequate. The standards should also be extended to include energy crops, not just traditional forestry.

### 4.2

Biomass sustainability and reporting standards are a necessary measure to ensure that biomass is being sourced in a sustainable way. Accredited installations should be required to source biomass fuel from approved suppliers, who in turn are expected to demonstrate that their fuels comply with set standards for biomass sustainability. How this is enforced is critical to the success of the scheme. If it is over bureaucratic and cumbersome in operation, it will disincentivise the entire scheme.

### 4.4

The proposals to make the metering simpler and to allow a certain discretion in the interpretation of the original requirements is welcomed.

### 4.5

While the trigger method may be required to manage annual Departmental budgets, it is a disincentive to the biomass heating sector. It will cause further uncertainty in a difficult market. One single large biomass plant coming on stream, early in a financial year has the capacity to stall the entire domestic market for several months, until a new financial year starts. This could be catastrophic for smaller installers who have geared up, in expectation of increased sales, only to find the entire market collapsing, part of the way through the financial year.

### 4.6

The terminology used in para 4.18 is worrying. It refers to "budgets" for something that has not been expended. If that logic is applied to the budgets referred to in the trigger table, it implies that once a large scale application has been approved, even if not constructed and generating heat, it will be considered as "in the budget". That will lead to speculative applications being made early in a financial year, which drain the budget from other bona fide applications.

Enhanced preliminary applications will further exacerbate this problem.

Best Regards,

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