

## Response ID ANON-1WWD-ZWV7-1

Submitted to Consultation on cleaner domestic burning of solid fuels and wood  
Submitted on 2018-10-12 15:04:37

### Introduction

1 What is your name?

Name:  
Caroline Ayre

2 What is your email address?

Email:  
caroline@confor.org.uk

3 What is your organisation?

Organisation:  
Industry body

If you answered "Other", please include details here::

Confor: Promoting forestry and wood ([www.confor.org.uk](http://www.confor.org.uk)) is a not-for-profit membership organisation which represents 1500 sustainable forestry and wood-using businesses across the UK. Confor represents the whole forestry and wood supply chain and focuses on strategic issues vital to the success and sustainable future of the sector.

4 Would you like your response to be confidential?

No

If you answered Yes to this question please give your reason::

5 What is your location?

County:  
Nationwide

### Wood

6 Volume restriction

Please provide reasons or evidence to support your answer:

Confor fully understands the need to address the issue of the supply of wet wood for domestic burning. However, feedback from Confor members would suggest that an arbitrary volume measurement of 2m<sup>3</sup> or less could unfairly target businesses who supply good quality, responsibly sourced, dry logs in loads under 2m<sup>3</sup>.

Surely this is an issue of consumer and retailer education not industry regulation.

7 Do you think that suppliers and retailers should be given a transition period to use up existing stocks of wet wood or allow time for it to air-dry?

Transition period of more than 1 year

Please provide reasons or evidence to support your answer:

A transition period of more than 1 year would allow for suppliers to dry different species of wood they have in stock that dry at different rates.

8 Do you think that smaller suppliers and retailers should be given a longer transition period?

No

9 Seasoning instructions

Agree

10 Do you agree or disagree that wood fuel suppliers should be required to be members of a certification scheme that provides assurance (via testing and auditing) that the wood is of a moisture content of 20% or less?

Neither agree nor disagree

11 Do you agree or disagree that retailers selling wood should be legally required to store the wood in such a way that it will not become wet?

No

12 In order to comply with the proposal to require all businesses selling wood in volumes under 2m<sup>3</sup> to ensure that it is dried to below 20% moisture, what adjustments, if any, would your business need to make?

Not Answered

Other::  
All of the above or simply not trade anymore. Provision has been made in the Agriculture Bill to support forestry and farming businesses to increase their productivity. It is essential that financial support continues to be available for firewood businesses to "kit-up" to supply kiln dried or air dried logs.

13 Would you like to provide any further comments or evidence on our proposals or the questions in this section?

Further comments or evidence on our proposals:

Q9: Trade Associations can provide their members with a template for this guidance.

Q10: This should be a voluntary decision.

Q11: This is unrealistic and unenforceable. Retailers should be educated not regulated.

The expansion of the firewood market in recent years has driven a renaissance in woodland management and the suite of public benefits that a well managed woodland delivers. Yet still only 12% of the total amount of hardwood growth in England's woodlands is harvested. Forestry Commission research shows a strong correlation between the location of privately owned woodland and rural deprivation. By supporting not further regulating the firewood industry government can support fragile communities with few other sources of employment.

Coal

14 Do you agree or disagree that government should phase out the use of traditional house coal for domestic combustion?

Don't know/don't have an opinion

15 If you agree, what would be the most appropriate end date for phasing out the use of traditional house coal for domestic combustion?

Don't know/don't have an opinion

Please provide reasons or evidence to support your answer:

No comment.

16 In phasing out the use of traditional house coal as a domestic fuel, what do you consider is a reasonable transition period to allow industry and householders to use up existing stocks?

Don't know/don't have an opinion

17 Do you agree or disagree that this policy should apply to all businesses?

Don't know/don't have an opinion

18 If you disagree, which of the following should apply?

Don't know/don't have an opinion

Please provide details of which businesses should be exempt and your reasoning.:

No comment.

19 In phasing out traditional house coal as a domestic fuel, government is minded to apply the phase-out nationwide across England. Do you agree or disagree?

Don't know/don't have an opinion

Not Answered

20 Would you like to provide any further comments or evidence on our proposals or the questions in this section?

Extra comments coal:

No comment.

## Manufactured solid fuels

21 Do you agree or disagree that government should introduce a standard for all manufactured solid fuels which confirms they are below 2% sulphur and meet a smoke emission limit of 5g /hr?

Don't know/don't have an opinion

22 In introducing a sulphur and smoke emission standard, do you consider that there should be a transition period for suppliers and retailers?

Not Answered

Please provide reasons or evidence to support your answer:

Don't have an opinion.

23 Do you agree or disagree that, over time, the 2% sulphur limit should be further reduced to 1% sulphur?

Don't know/don't have an opinion

Other::

Don't know / not applicable

24 Do you agree or disagree that government should introduce a clear labelling requirement to demonstrate that fuels meet the standard?

Don't know/don't have an opinion

25 In order to comply with the proposal to phase out traditional house coal and apply sulphur and smoke emissions standards to all solid fuels, what adjustment, if any, would your business need to make?

Not Answered

Other::

Don't have an opinion.

26 Would you like to provide any further comments or evidence on our proposals or the questions in this section?

Extra comments MSF:

No comment.

## Carbon reductions

27 Do you agree or disagree that government should, over the longer term, introduce a requirement that all manufactured solid fuels have a minimum 30% biomass content?

Don't know

Suggested percentage:

28 For businesses: If government mandated a biomass content how long would it take you to adjust?

Not Answered

29 Would you like to provide any further comments or evidence on our proposals or the questions in this section?

Extra comments biomass:

Confor would question why the UK should import biomass by-products, i.e. olive pulp and coconut husks rather than using locally produced, sustainably sourced woodfuel from UKFS (UK Forestry Standard) compliant woodlands.

## Exemptions

30 We are interested in your views on how government should support those in fuel poverty with this transition away from high-carbon fossil fuels

Fuel poverty:

No comment.

31 Would you like to provide any further comments or evidence on this section?

Extra comments exemptions:

No comment.

## Implementation

32 What do you think would be an appropriate level of fixed penalty related to the sale of domestic burning products?

Not Answered

Other::

This proposal does not reflect the reality of current LA budgets. Any increase in regulatory burden on LAs is unsustainable in the current funding climate. No evidence has been given as to how many penalty notices are issued in these type of circumstances and whether or not they are effective, i.e. littering. A full cost benefit analysis should have been undertaken by Defra before consulting on these proposals.

33 Do you think that local authorities should be required to use any funds from this for a specific purpose?

Not Answered

Please specify::

See above. This proposal is unreasonable, poorly thought out and entirely disproportionate to the apparent problem. Government has frozen fuel duty for the ninth year in a row and now proposes burdensome regulation on a sector that is already highly regulated to produce sustainable woodfuel.

34 Do you agree or disagree that this will deliver our objective of establishing a clear and straightforward enforcement policy, minimising burdens for Local Authorities?

Not Answered

Please suggest any alternative proposal that you consider to be more effective in delivering our objectives:

See above answers.

35 Government will provide advice and guidance to retailers selling domestic burning products. What format should this take?

Not Answered

Other::

All of the above but a full cost benefit analysis must be undertaken first.

## Information

36 What information do you think would be helpful to enable householders to reduce their impact from domestic burning?

Impact reduction information:

Government should provide a free moisture meter with every woodburning stove.

37 What do you think would be the most effective way of communicating information to householders?

Other::

All of the above.

38 For householders: Where do you buy your fuel?

Other::

Confor questions why there is no mention of foresters or woodland owners/managers in this list. They are, after all, the suppliers of woodfuel. The forestry and wood sector are working very hard to educate the public about forestry and sustainable woodland management to engender a wood culture in the UK. Yet again this shows the forestry phobic stance repeatedly taken by Defra.

## Additional suggestions

39 Do you have any additional comments/views that you wish to provide on the content of this consultation?

Consultation feedback: