

Air Quality: Using Cleaner Fuels for Domestic Burning

DEFRA Consultation Response

The Department for Environment, Food & Rural Affairs (DEFRA) has released its long-awaited response to its consultation on using cleaner fuels for domestic burning, following its Call for Evidence in August 2018. The consultation response is available here: [\[LINK\]](#)

Key takeaways

- 1. Wood sold in single units less than 2m³ (loose stacked) must have a moisture content of 20% or less, with retailers who sell wet wood over this volume required to provide advice to consumers on how to dry it ready for burning.*
- 2. A ban on all pre-packaged traditional bituminous house coal (i.e. that sold through retailers, supermarkets, DIY stores).*
- 3. A nationwide requirement (currently applying in Smoke Control Areas only) requiring a certified controlled sulphur content (maximum 2%), and a smoke emission limit for all manufactured solid fuels.*

Responses to the consultation were varied, but the arguments surrounding consumer choice, fuel poverty, and differing circumstances in rural and urban use appear most salient, and influential in the chosen action by DEFRA.

The argument on education also seems key, with Government clearly framing its communication and transition plans around a broader education agenda, which would help those most affected become better informed, for instance on the impact of burning wet wood, or the relative inefficiency of coal vs manufactured solid fuels, despite a lower initial cost.

Unfortunately, the issue of enforcement and compliance is given less attention, despite the summary of response indicating that a number of organisations referenced the issue. They have now promised to provide more detailed guidance on the size of any proposed fixed penalty, as well as how enforcement will be guaranteed.

Overall, the action is clear that it wants to encourage a shift from traditional house coal to manufactured solid fuels.

Wood

On wood specifically, proposals will be taken forward for a **mandatory certification scheme**, which will demonstrate that wood meets the 20% moisture requirements. This measure was backed by the majority of respondents, as was a legal requirement that retailers selling wood should be legally required to store the wood in such a way that it will not become wet. The latter will be introduced, but in later guidance.

On transition, the mandatory certification scheme **will come into effect one year from the publication of the Government's response – i.e. by February 2021**. Following responses from small foresters (producing less than 600m³ a year) this group will be given an extra year to comply.

Coal

For coal, the Government intends to introduce a national ban on the sale of all bagged traditional house coal. This ban will apply from one year from publication (again, coming into force by 21st February 2021), with the temporary exemption that approved coal merchants will be given a further year to sell loose traditional house coal direct to customers (February 2022).

A particular concern in this sector was the implications for those in fuel poverty. In response to this, the Government quote its own analysis that manufactured solid fuels are more efficient on an energy density basis, conceding that education is needed in this area.

On coal users switching to wood, the Government says that this will still have an overall benefit, but that education measures will be put in place to promote manufactured solid fuels or smokeless coal, whichever is most appropriate.

Manufactured Solid Fuels

Of interest to members, the Government has decided not to introduce a requirement that all manufactured solid fuels have a minimum biomass content.

By 21st February 2021, all manufactured solid fuels for use in domestic combustion must conform to a test confirming sulphur content is below 2%, and that the fuels emit less than 5g smoke per hour. There was no consensus that the sulphur content should be reduced in future, but the Government has confirmed it is 'minded to review' this in the future.

Furthermore, the Government **intends to introduce a requirement** that all manufacturers of solid fuels must get their products certified, which will be clarified in later guidance.

Next Steps

Going forward, DEFRA is intending on releasing further guidance, particularly on certification schemes, how to introduce requirements for retailers, as well as education for consumers.

At this point, it doesn't look like their intention is to consult on the contents of the guidance. That being said, they do leave the door open for consulting on further issues at a later date, for instance on the sulphur content of manufactured solid fuels.