

# **British Sugar RTFO Year 3 Report**

**Version: 3.3 Final Report**

**26<sup>th</sup> September 2011**

**Document Owner: N GRIFFITHS**



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## **Chapter 1 – Introduction & Scope**

British Sugar operates a 75 million litre Bioethanol plant at its Sugar Factory in Wissington in East Anglia. The plant runs off a UK Sourced Sugar Beet Feedstock only.

This report is to present the data for all bio fuels sold over the duty point and therefore obligated under the RTFO. This report summarises all of British Sugars monthly reports of volume and C&S data for Year 3 of the RTFO.

To generate our Carbon & Sustainability data, Feedstock Default values from Technical Guidance Part One version 3.3 have been used.

## Chapter 2 – Summary Data for Carbon & Sustainability

Table 5 – Source of Feedstock

	General		Environmental	Social	Carbon	
<b>Feedstock</b>	<b>% Fuel Supplied by Feedstock type (by volume)</b>	<b>% Data reported on biofuel characteristics</b>	<b>% Meeting Qualifying and/or RTFO standard</b>	<b>% Meeting Qualifying and/or RTFO standard</b>	<b>Average carbon intensity g CO2e/MJ</b>	<b>Average % GHG Saving</b>
Bioethanol						
Sugar Beet	100	100	100	0	40	52

All of our Feedstock is sourced from UK sourced sugar beet. Carbon values are feedstock defaults.

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**Table 6 – British Sugar Volumes in ROS**

General Information							Sustainability Information				Carbon Information		
Period End	Batch Ref	Fuel Type	Quantity (Std litres)	Biofuel Feedstock	% of total sugar beet	Feedstock Origin	Standard	Env Level	Social Level	Land Use in Nov 2005	Carbon Intensity gCO <sub>2</sub> e/MJ	% GHG Saving	Accuracy Level
31/04/2010	12	Bioethanol EtOH P595	793,003	Sugar Beet	100	United Kingdom	ACCS	RTFO	None / Unknown	Cropland	40	52	1
30/05/2010	13	Bioethanol EtOH P595	2,098,782	Sugar Beet	100	United Kingdom	ACCS	RTFO	None / Unknown	Cropland	40	52	1
31/06/2010	14	Bioethanol EtOH P595	2,101,725	Sugar Beet	100	United Kingdom	ACCS	RTFO	None / Unknown	Cropland	40	52	1
31/07/2010	15	Bioethanol EtOH P595	2,072,268	Sugar Beet	100	United Kingdom	ACCS	RTFO	None / Unknown	Cropland	40	52	1
31/08/2010	16	Bioethanol EtOH P595	1,915,229	Sugar Beet	100	United Kingdom	ACCS	RTFO	None / Unknown	Cropland	40	52	1
30/09/2010	17	Bioethanol EtOH P595	2,357,064	Sugar Beet	100	United Kingdom	ACCS	RTFO	None / Unknown	Cropland	40	52	1
31/10/2010	18	Bioethanol EtOH P595	1,956,984	Sugar Beet	100	United Kingdom	ACCS	RTFO	None / Unknown	Cropland	40	52	1

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30/11/2010	19	Bioethanol EtOH P595	2,001,993	Sugar Beet	100	United Kingdom	ACCS	RTFO	None / Unknown	Cropland	40	52	1
31/12/2010	20	Bioethanol EtOH P595	1,843,716	Sugar Beet	100	United Kingdom	ACCS	RTFO	None / Unknown	Cropland	40	52	1
31/01/2011	21	Bioethanol EtOH P595	2,407,368	Sugar Beet	100	United Kingdom	ACCS	RTFO	None / Unknown	Cropland	40	52	1
28/02/2011	22	Bioethanol EtOH P595	1,958,521	Sugar Beet	100	United Kingdom	ACCS	RTFO	None / Unknown	Cropland	40	52	1
31/03/2011	23	Bioethanol EtOH P595	2,310,222	Sugar Beet	100	United Kingdom	ACCS	RTFO	None / Unknown	Cropland	40	52	1
14/04/2011	24	Bioethanol EtOH P595	36,160	Sugar Beet	100	United Kingdom	ACCS	RTFO	None / Unknown	Cropland	40	52	1
			<b>23,853,035</b>										

## **Chapter 3 – Fuel Supplier Information**

### **Improvement of sustainably sourced feedstock**

All of our Sugar Beet feedstock is sourced from the UK, predominantly the East Anglia area. No other feedstocks are used to produce bioethanol.

### **Memberships of associations for sustainable feedstocks**

British Sugar's sugar beet supply is accredited to the Red Tractor Assurance Scheme (formally Assured Combined Crop Scheme).

### **Improvements to Carbon Data**

This RTFO year feedstock default values have been used. Following the implementation of RED legislation it is anticipated that British Sugar will revert back to carbon intensity based on actual measured data where possible.

### **Environmental Management Systems Certificates**

British Sugar plc is accredited to ISO14001:2004 which has been certified by LRQA. The current certification extends until 30<sup>th</sup> June 2014, certificate number LRQ0772234.

### **Prosecutions for breaches of social and environmental compliance**

British Sugar has no prosecutions for breaches of environmental and social regulations relating to its biofuels activities.

### **Corporate Sustainability Report**

British Sugar UK has published a corporate sustainability report which is available at <http://www.britishsugar.com/Sustainability.aspx>. This report has not been verified.

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### **Continuous Improvement Plan**

As part of our ongoing improvement British Sugar has undertaken a number of projects to improve efficiency and sustainability.

For subsequent years the process of calculating actual carbon data will be formalised to ensure that at the start of each RTFO/RED period we are utilising the correct methodology as laid out by DfT. This will be added as a responsibility to the ethanol Business Manager's job description.

Agriculture data management – Further development through automated agriculture contracting systems that are on line improving efficiency, removing data transposition errors and eliminating a significant number of paper communications to our 4000 growers.

Agricultural yield improvements – British Sugar is currently undertaking an out growers scheme which is designed to move the source of our feedstock closer to our factories and improving the yields of our sugar beet. We have also targeted growers with achieving 100t/hectare and improving agricultural yields.

Review of energy reduction projects – British Sugar is currently reviewing a number of energy projects including Bio energy which will supply our own gas to the CHP plant and a number of energy reduction projects across our business.

Bioethanol Yield – We are improving the efficiency of the plant by using less sugar in our bioethanol plant to make the same production levels of ethanol. Our target is to continue to improve yield from 1.56t sugar / m<sup>3</sup> ethanol to 1.52t sugar / m<sup>3</sup> ethanol.

Data Storage – All sugar beet contract information is held in our Croplands Database. All biofuel dispatch data is held in our JDE business management system with RTFO data extracts held centrally in addition to our carbon management data to ensure easy access to data at all times.

Bioethanol management continuity - The bioethanol management processes are being mapped out in August and September 2011 to ensure that clear procedures for all activities are documented and adhered to. This will improve business continuity and management robustness for the biofuels area.





## ANNUAL INDEPENDENT LIMITED ASSURANCE OPINION STATEMENT REPORT

Statement Reference Number: GB10/81336-2

To: Neil Griffiths, Business Manager - Commercial  
British Sugar Limited  
Sugar Way  
Peterborough  
PE2 9AY

This Annual Independent Limited Assurance Statement is given on 26 September 2011.

### **1. RESPONSIBILITIES**

It was the responsibility of British Sugar Limited to prepare the RTFO C&S Annual Report for the period (15 April 2010 to 14 April 2011) (the 'C&S Report').

It is the responsibility of SGS United Kingdom Limited to provide the client with assurance conclusions and a limited assurance opinion on this statement.

### **2. ASSURANCE CRITERIA**

The following criteria were used to assess British Sugar Limited annual carbon and sustainability reports and supporting data with respect to:

- Traceability
- Completeness
- Consistency
- Accuracy

The following documents were referenced in the assurance process and in preparation of the opinion statement:

- ISAE 3000:2005
- RFA Guidance for verifiers (Version 3.0 – March 2011)
- ISO 19011:2002
- Renewable Transport Fuels Obligation technical guidance parts 1 & 2 (Version 3.4 – May 2011, and Version 3.1 -, April 2010, respectively)

### **3. WORK PERFORMED**

#### **Annual Carbon and Sustainability Report**

The Annual Carbon and Sustainability Report for the 15 April 2010 to 14 April 2011 reporting period was reviewed to verify compliance to RTFO technical guidance with respect to the criteria at section 2.

This included assessment of required content as appropriate: Chapter 1: Introduction and Scope, Chapter 2: Tables 5 & 6 – Summary data for C&S, Chapter 3: Chapter 3: Carbon Improvement - Efforts to reduce Carbon Intensity; Activities to support standard development for sustainable feedstock's; Production of feedstock on idle land; Data improvements



## **ANNUAL INDEPENDENT LIMITED ASSURANCE OPINION STATEMENT REPORT**

Environmental Management Systems; Prosecutions of environmental breaches; Existing verified environmental / corporate responsibility reports; Continuous Improvement Plan.

### **Supporting documentation**

Using interviews of relevant personnel, review of data, C&S reports and supporting management process documentation, the following activities were conducted:

- Personnel interviews
  - Neil Griffiths (Business Manager – Commercial)
  - Robert Brookes (Carbon Manager, Operations Services)
  - Richard Riley (Agricultural systems Manager)
  - Louise Walker (Agricultural helpdesk manager)
- Review of document control processes
- Review of Mass balance spreadsheets (all months)
- Review of Feedstock records
- Review of C&S records
- Review of Monthly reports (all months)
- Review of final version ROS C&S reports

### **Accountability**

It was further verified that 'single point accountability' for C&S reporting has been implemented within the organisation.

### **Chain of Custody**

Data samples were reviewed from primary source along the chain of custody using production records, supplier and seller certificates of authenticity and ROS report entries as relevant to British Sugar Limited operations. These were in turn verified against the summary data contained in the draft annual report.

The qualitative statements relating to biofuel production and improvements were reviewed for accuracy, consistency and relevance to the required reporting standard.

The annual carbon and sustainability report for the reporting period 15 April 2010 to 14 April 2011 was reviewed and found to contain all sections and content in line with requirements.

All observations and opportunities for improvement raised throughout this limited assurance audit were effectively actioned by the client and closed out.

## **4. LIMITATIONS**

The verification was conducted by review of a randomly selected sample of contract data sampled on a monthly basis (as noted above) and does not apply to records not reviewed.

The accuracy of the reported data is dependent on the accuracy of metering and other production measurement arrangements employed at site.

*Feedstock defaults are applied and reported as appropriate.*



## ANNUAL INDEPENDENT LIMITED ASSURANCE OPINION STATEMENT REPORT

### **5. LIMITED ASSURANCE CONCLUSION & OPINION STATEMENT**

**Based on the work described and referenced in this report, nothing has come to our attention that causes us to believe that British Sugar Limited Annual Carbon and Sustainability Report to the RFA for reporting period 15 April 2010 to 14 April 2011 is not accurate, in all material respects, based on the criteria set out in section 2 of this report and subject to the limitations set out in section 4 of this report.**

This report was prepared by: David Fairchild.

Authorised by:-

A handwritten signature in black ink, appearing to be 'Jan Saunders', written over a horizontal line.

**Jan Saunders**

**UK SSC Business Manager**

**For and on behalf of SGS United Kingdom Ltd**

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