



Department
for Transport

Targeting net zero - Next steps for the Renewable Transport Fuels Obligation Consultation response form



1. Introduction and data protection

The consultation period begins on 25 March 2021 and will run until 11:45 p.m. on 23 April 2021. Please ensure that your response reaches us **on or before** the closing date. Due to remote working for the foreseeable future and health and safety issues with handling physical mail, we strongly encourage responses by email. Please send consultation responses to:

LowCarbonFuel.Consultation@dft.gov.uk. If you are unable to respond by email, we would invite you to respond by asking someone to email on your behalf. If this is not possible, then we invite you to provide responses to:

Low Carbon Fuels Team
Department for Transport
Zone 1/32 Great Minster House
London SW1P 4DR

If you would like further copies of this consultation document you can contact the Low Carbon Fuels team at the details above and they can also help if you need alternative formats (Braille, audio, CD):

When responding, please state whether you are responding as an individual or representing the views of an organisation. If responding on behalf of a larger organisation, please make it clear who the organisation represents and, where applicable, how the views of members were assembled. If you have any suggestions of others who may wish to be involved in this process please contact us or forward the document to them.

The responses to this consultation are likely to be discussed with representatives of the sector, as well as within the Department. Therefore the points you raise may be shared. If you are not content for this to happen please let us know. Subject to the outcome of the consultation the amendments to the legislation will be introduced as soon as practicable.

Confidentiality and data protection

The Department for Transport (DfT) is carrying out this consultation to gather views on making amendments to the Renewable Transport Fuels Obligation. This consultation and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. If your answers contain any information that allows you to be identified, DfT will, under data protection law, be the Controller for this information.

As part of this consultation we're asking for your name and email address. This is in case we need to ask you follow-up questions about any of your responses. You do not have to give us this personal information. If you do provide it, we will use it only for the purpose of asking follow-up questions. [DfT's privacy policy](#) has more information about your rights in relation to your personal data, how to complain and how to contact the Data Protection Officer.

Your information will be kept securely and destroyed within 12 months after the consultation has been completed.

2. Responding

1. Your name and email address. We will only use this if we need to contact you to ask about any of your responses and to update you when we publish our response.

Name	Gloria Esposito
Email	Gloria.Esposito@zemo.org.uk

2. Are you responding: *

<input checked="" type="checkbox"/>	On behalf of an organisation? Go to question 3
<input type="checkbox"/>	As an individual? Begin consultation response (section 3)

3. Organisation details: *

Address	Zemo Partnership
	3 Birdcage Walk, London
Postcode	SW1H 9JJ
Email	hello@zemo.org.uk
Your Role / Position	Head of Sustainability
Please tick one box below that best describes your company or organisation.	
<input type="checkbox"/>	Academic
<input type="checkbox"/>	Consultancy
<input type="checkbox"/>	Fossil fuel supplier/producer
<input type="checkbox"/>	Renewable fuel supplier/producer
<input checked="" type="checkbox"/>	Non-governmental organisation
<input type="checkbox"/>	Representative organisation
<input type="checkbox"/>	Trade union
<input type="checkbox"/>	Interest group
<input type="checkbox"/>	Local government
<input type="checkbox"/>	Central government
<input type="checkbox"/>	Other (please describe):
<p>If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members:</p> <p>Zemo Partnership has over 200 members. The Secretariat team sought feedback from members on the proposals set out in the consultation and hosted a meeting on 13th April 2021, inviting members and a representative from the DfT to discuss a number of</p>	

the proposals set out in the consultation. There were around 25 attendees at the meeting.

3. Consultation questions

The questions below may not apply to all respondents. Please answer as many as are applicable to you or your business. In each case please set out the reasons for your answer and if applicable, alternative proposals.

Questions on the main Consultation proposals - Targeting net zero - Next steps for the Renewable Transport Fuels Obligation

Q1. Should we increase, decrease or keep the main obligation at the same level?	Increase ✓		
<p>Please provide evidence and reasoning for your answer.</p> <p>The main obligation should be increased accelerate greenhouse gas (GHG) emissions savings from road transport over the next decade. This will be necessary for accommodating the introduction of E10 this year, the increasing market demand for biomethane in artic HGVs and facilitating greater adoption of high blend renewable fuels in HDVs. It will also send a positive signal to investors with regards to the UK's renewable fuels market.</p>			

Q2. If you agree that we should increase the RTFO obligation, what level should it be increased by; 1.5%, 2.5% or 5%?	1.5%	2.5%	5%
<p>Please provide evidence and reasoning for your answer.</p> <p>The UK needs to be ambitious in order to meet the 68% economy wide GHG reduction by 2030 stated in the consultation, and the recent announcement of a new climate change target of 78% GHG reduction by 2035. Given that transport emissions represent 27% of GHG emissions, more aggressive interventions are required to reduce GHG emissions over the next decade. A number of countries in Europe have been progressive in adopting much higher renewable fuel mandates. This includes Germany which has introduced a new renewable fuels transport target of 28% by 2030. Zemo supports the increase of the RTFO's main obligation, this should without doubt be increased by 1.5% to accommodate the introduction of E10. However, the two alternative targets proposed in the consultation of 2.5% and 5% are far too low and will not help the UK accelerate GHG emission reduction from road transport. Zemo believes the target should be increased to a significantly higher level from 2023. The</p>			

RTFA's recent study "Bridging the carbon gap: keeping UK transport decarbonisation up to speed with Net Zero" presented evidence demonstrating that the RTFO target can rise to at least 21% by 2032. The report suggested that an expansive policy should be designed to support growth and innovation in new biogenic feedstocks according to strict sustainability standards. This study demonstrates the availability of sustainable feedstock is not a barrier to increasing the target.

Zemo recommends DfT revisits the vehicle fleet and fuel demand modelling work undertaken as part of the RTFO consultation, with view to include more realistic EV adoptions rates in LDVs and biomethane use in HGVs up to 2032. This should take into account the Government's decision to end sales of ICEs by 2030. The analysis presented in Figures 6 and 7 appears suggests lower than expected electric vehicle adoption in LDV and biomethane in HGVs. Zemo recommends this review takes place in 2023 and consideration is given to significantly increasing main RTFO target.

In order to accelerate GHG emission reduction from the road transport sector over the next decade, Zemo suggests the main obligation should have larger incremental increases over time, rather than waiting for 2032 to achieve maximum savings. The rational being that GHG emission benefits are cumulative and greater GHG savings could be achieved much earlier.

Zemo are of the opinion that blend walls should also not be seen to be an issue: while E10 is limited to 10% bioethanol, it is possible to increase the bio content using existing processes for ethanol to gasoline conversion. The biodiesel and bioethanol blend levels in retail fuels can also be increased in future. Furthermore, commercial fleets can use higher biodiesel blends and blends of HVO.

Zemo believes renewable fuels provide a significant opportunity for reducing GHG emissions from HGVs, one of hardest transport sectors to decarbonise. Zemo's recent study "Market opportunities to decarbonise HDVs using high blend renewable fuels" identified the growing market for biomethane in HGVs, in particular long haul. The sector is demonstrating significant adoption rates, accompanied by expansion of CNG and LNG refuelling stations across the UK. Zemo HGV modelling work exploring GHG emission reduction benefits of high blend biofuel take up, adopted a 30% biomethane truck take up rate for the artic fleets by 2030. Industry felt this was a realistic adoption rate and achievable. In terms of more near term take up rates, engagement with biomethane suppliers, and announcements by fleet operators, indicates a 13%-15% biomethane adoption rate by artic gas trucks is highly probable. This demonstrates a much more ambitious adoption rate than in DfT's modelling work which chose a value of 16% by 2030. Zemo members are of the opinion that biomethane supply is not being constrained by lack of waste-based feedstock nor demand.

Other organisations have undertaken work which also supports both a rise in the biomethane supply chain over the next decade and a switch to gas trucks. This includes the ADBA's report "Biomethane – the pathway to 2030" and a recently published report by Cadent "The Future Role of Gas in Transport".

Zemo's study demonstrated there are significant opportunities for HBRFs (high blend renewable fuels) to decarbonise HGVs over the next decade (and beyond). This includes FAME blends B20 – B100, HVO and biomethane. Stakeholders involved in the study were of the opinion that an average 30% adoption of high blend liquid renewable fuel in HGVs could be achieved by 2030. Various policy measures would be required to help this materialise. As petrol and diesel volumes decrease due to the increasing

purchase rate of zero emission vehicles, sustainable biodiesel supplies could be liberated from the LDV fleet to become available for HDVs, in particular HGVs. Furthermore, the early adoption of electric trucks in city regions and the growth in electric buses (61% of new sales in 2020), will additionally provide an opportunity for sustainable renewable liquid fuels to be diverted to the HDV market. Zemo's HBRF study indicated that the UK HGV fleet will have a diesel demand of c8 billion litres equivalent over the next 10 years. This large volume of fossil fuel requires decarbonisation, with high blend renewable fuels providing a solution.

Zemo's high blend renewable fuels study has revealed a rise in the use of HVO, with increasing interest from both logistic fleets and NRMM sectors. This provides further evidence to support a more ambitious target increase given the rising demand for drop in renewable diesel. New investments in HVO plant are taking place in the EU and US, with expansion of existing facilities in Asia. Most facilities plan to utilise waste and residue feedstocks, meaning that HVO will be the largest source of advanced biofuel output growth over the forecast period. Other opportunities for drop-in fuels, from more advanced feedstocks, include renewable diesel produced via the Fischer-Tropsch production processes and bio-gasoline involving alcohol dehydration and biomass to liquid processing.

DfT modelling indicates a significant reduction in demand in biodiesel/HVO by 2032, following an increase in the uptake of EVs and biomethane for HGVs. Zemo members are of the opinion that reducing the waste-based liquid renewable fuel market could have an adverse impact on the renewable fuels industry: the proposed 2.5% option risks removing from the market for 500-800 million litres of sustainable waste derived biodiesel (already in production) by 2032. This stock should be diverted to alternative applications such as high blend biofuels for HGVs, trains and NRMM. With a target of 2.5%, RTFC prices could plummet, with implications on cost effectiveness potentially leading to plant closures. This could also result in a negative impact on the confidence of investors for new plants and products. Low carbon fuel investors will likely look at these proposed government changes and begin to question investments into UK facilities, where, at a point in time, the government can easily change its mind and policies thus affecting returns. This could likely lead to investors switching funding to other countries where a more stable platform for investment exists in terms of government support and market guarantees. This in turn could lead to the UK have to import large volumes of low carbon fuels.

Zemo are aware of DfT's unease of setting a more demanding target in case less sustainable biofuels are introduced in the UK, in particular certain energy crops. Given the UK's sustainability criteria are among the most stringent in the world, it is difficult to see how unsustainable feedstock could be encouraged. The UK crop cap is amongst the tightest set under RED II. If risks arise in the future, then criteria and checks can be strengthened, as has been done in the past. One area that DfT may wish to consider in terms of strengthening sustainability standards is the introduction of additional audit checks for imported biogenic waste oil, to guarantee the provenance of these feedstocks across their supply chain. This could be achieved through blockchain technology, Bioledger and RSB are currently working on an innovative initiative. DfT could consider requiring this as an additional part of voluntary scheme sustainability certification. Finally, the inclusion of recycled carbon fuels in the RTFO will provide additional renewable fuel that will help meet the target, providing further resources.

Q3. Do you agree or disagree that recycled carbon fuels should be eligible for support under the RTFO given their potential to deliver GHG savings?	Yes ✓	
<p>Please explain your reasons:</p> <p>Agree, however it is important to ensure that use of these feedstocks does not undermine the waste hierarchy.</p>		

Q4. Do you agree or disagree that only RCFs derived from refuse derived fuel and industrial wastes gases should be eligible for RTFO support?		Disagree
<p>Please explain your reasons, and if you disagree please provide an alternative approach and set out why.</p> <p>Zemo members are of the opinion that the feedstock criteria should not rule out end of life tyres. Feedstocks should be required to meet the RTFO carbon and sustainability criteria, rather than selecting specific feedstocks based on technological and economic characteristics. The scope of which feedstocks can be used needs to be widened, as presented it is too restrictive. It is worth highlighting that the RED II definition for RCFs is less prescriptive than is being proposed in the consultation.</p>		

Q5. Do you agree or disagree that RCFs produced from solid feedstocks should contain at least 25% biogenic content, by energy?	Agree	Disagree
<p>Please explain your reasons, and if you disagree please set out an alternative approach with evidence as to why.</p> <p>Difficult to provide a definitive answer as the rationale for setting a limit of 25% is perceived as unclear by Zemo members. Consideration should be given to alternative approaches.</p>		

<p>Q6. Do you agree or disagree that support for RCFs should focus on those RCFs which can meet the UK's future strategic needs? That is, that only RCF types which are equivalent to current development fuels should be eligible for support. As such they would be eligible for development fuel certificates and to count towards the development fuel sub-target under the RTFO.</p>	<p>Agree</p> <p>✓</p>	
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Please explain your reasons.

Zemo are of the opinion that all RCFs should be eligible for support, so long as the meet RTFO's GHG and sustainability criteria.

<p>Q7. Do you agree or disagree with the proposed GHG minimum thresholds and the timeline for increasing GHG emission saving criteria for RCFs?</p>		<p>Disagree</p> <p>✓</p>
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Please provide an explanation as to why.

Zemo are of the opinion that the same GHG minimum thresholds and timelines should apply to all renewable fuel feedstocks – RFC and conventional renewable fuels. If fuels produced from RCFs do not provide the same benefits as renewable fuels they should not qualify for support.

<p>Q8. Do you agree or disagree with the proposed GHG emissions methodology to assess the GHG savings for recycled carbon fuels?</p>	<p>Agree</p> <p>✓</p>	
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Please provide an explanation as to why.

Agree in general, however some of Zemo members question the assumption that incinerators meet the R1 standard. Another issue raised is the choice of using an identical counterfactual for solid and waste gases. A preferred approach would be for the waste gas counterfactual to be the carbon intensity of waste gases that would be flared or combusted to provide power or heat for industrial process.

Q9. Do you agree or disagree with our proposal that RCFs from solid feedstocks are eligible for two x 0.25 dRTFCs per litre, and RCFs produced from gaseous feedstocks are eligible for two x 0.5 dRTFCs per litre?

Disagree

✓

Please explain your reasons.

The value of RTFCs for solid waste feedstocks is considered too low and does not provide sufficient incentive to process RCFs in gasification facilities. An alternative approach suggested is that solid and gaseous feedstock should be eligible for either RTFCs or dRTFCs depending on what type of fuel is being produced and not be reduced by $\frac{1}{4}$ or $\frac{1}{2}$ (for solids and gases respectively). This is considered a more simplistic and pragmatic approach.

Q10. RCFs from industrial waste gases have the benefit of avoiding release of the industrial gases to the atmosphere. Do you have evidence as to how it can be demonstrated that avoided GHG emissions have not been claimed elsewhere (e.g. under the Emission Trading Scheme), and that they have been attributed to the final fuel?

No

✓

Please provide evidence.

Q11. Is “renewable energy that would not have been available to the grid in the absence of power demand from the RFNBO plant in question” an appropriate definition of additional renewable energy?

Yes

✓

No

Please provide your reasons.

Q12. Should the Administrator be able to take into account the use of power purchase agreements (PPAs) as evidence that suppliers have purchased additional renewable energy in order to allow the renewable power generation to be located in a separate location from the RFNBO production facility?

Yes

✓

No

Please provide your reasons.

Yes, but care needs to be taken with an on-site electrolyser receiving renewable electricity from a remote location and using the electricity grid for distribution to the refuelling station. It is imperative a system is in place to track this renewable electricity travelling through the electricity grid and ensure it is solely used for the purpose of powering the electrolyser.

Q14. Should appropriate adjustments be made to the amount of renewable energy supplied to a RFNBO production facility to account for transmission losses where renewable energy is transferred over the electricity grid?

Yes

✓

No

Please provide your reasons.

Yes, this seems reasonable.

Consideration should be given to accounting for fugitive hydrogen losses in RFNBO GHG emissions calculations. This can arise during the transportation/distribution and storage of hydrogen. Hydrogen has a GWP of 5.8 due to its influence on methane and ozone concentrations, both greenhouse gases. Given that methane losses are required to be accounted for in the transmission of biomethane through the EU and UK gas grid, a similar methodological approach should be adopted for hydrogen. Zemo is undertaking a detailed LCA study on low carbon hydrogen production pathways and can provide more evidence on this once the report is finalised.

Q15. Do you have any comments on the proposal to use a 30-minute time period for temporal correlation of renewable energy production and use?

Yes

✓

No

This appears to be a pragmatic approach.

<p>Q16. Should the Administrator be able to permit fuel suppliers to use local grid GHG emissions factors in RFNBO GHG emission calculations? Circumstances in which this might be appropriate include where there are local grid constraints or other local conditions which mean that the local grid GHG intensity differs substantially from that of the national grid.</p>	<p>Yes</p> <p style="text-align: center;">✓</p>	
<p>Please provide your reasons.</p> <p>Agree, on the provision that the GHG savings should not be accounted for elsewhere. Zemo would like to propose that all renewable fuels should be permitted to use local grid electricity factors in their life cycle.</p>		

<p>Q17. A consequence of allowing local grid GHG emissions to be used in calculating the GHG intensity for a RFNBO is that GHG savings may be claimed by a production facility on a low GHG emission regional/local grid which have also Targeting net zero - Next steps for the Renewable Transport Fuels Obligation been accounted for in the average national grid GHG intensity. Is this risk acceptable?</p>	<p>Yes</p> <p style="text-align: center;">✓</p>	<p>No</p>
<p>Please provide your reasons.</p> <p>This proposal should be carefully monitored and rigorous checking of what is being claimed, with third party peer reviewing, should take place to ensure that the intention of this proposal is actually delivered in practice.</p>		

<p>Q18. Have we captured all the additionality scenarios as set out in the proposals in the chapter and in the decision tree (Figure 13)? Please suggest alternatives with evidence</p>	<p>Yes</p>	<p>No</p>
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Please provide your reasons.

Q19. Do you agree or disagree that biohydrogen produced from biomethane reformation should be eligible for standard RTFCs rather than development fuel RTFCs?

Agree

✓

Disagree

Please suggest alternatives with evidence.

Q20. Certain advanced production methods for biohydrogen are likely to be of strategic future importance and require new investments, such as addition of CCS. Do you agree or disagree that when these methods are used, biohydrogen produced from biomethane reformation should remain eligible for development fuel RTFCs?

Agree

✓

Disagree

Please provide your reasons.

Yes agree, however Zemo recommends clarity is given on the definition of the term 'strategic future importance' and what timeframe this relates to. DfT could consider expanding the scope of biohydrogen in terms of CO₂ abatement to include carbon capture storage and utilisation. There is currently no means of incentivising an existing or new AD plant to capture the CO₂ for use as a 'green' low carbon industrial product. For example, where the green CO₂ could replace CO₂ produced from fossil fuel. Allowing biohydrogen produced from biomethane linked with CCUS could provide an incentive for this investment, with substantial benefits in terms of GHG savings.

Q21. Hydrogen is likely to be an important power source for parts of the railway that are not possible to electrify. Do you agree or disagree that renewable fuel used in trains powered by fuel cells should eligible for RTFCs?	Agree ✓	Disagree
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Please provide your reasons.

Q22. Hydrogen also has the potential to be an important power source for construction and other non-road vehicles. Do you agree or disagree that renewable fuel used in these vehicles powered by fuel cells should be eligible for RTFCs?	Agree ✓	
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Q23. Hydrogen supplied to retail customers is already eligible for RTFCs. Do you agree or disagree that the assessment time for hydrogen should be amended to make clear that fuel supplied to commercial customers can also qualify for RTFCs?	Agree ✓	
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Please provide your reasons.

There are multiple pathways for producing and transporting low carbon hydrogen, these will widen over the next decade. It is imperative that customers (retail and commercial) have assurance that their hydrogen supply chain is both low carbon and sustainable. This becomes particularly relevant in the case of electrolyzers and demonstrating the renewable electricity supply is in fact generating 'additionality'. Some existing HRS are co-located with electrolyzers using green tariffs. A robust audit system will be required to track renewable electricity via PPAs. Hydrogen suppliers are likely to be offering a variety of low carbon supply chains in the early stages of market development, differentiating the C&S performance of each of these

to their customer base will be essential – for example ‘blue’ v ‘green’ hydrogen (RTFO approved).

Q24. Do you agree or disagree that the default and disaggregated default values for calculating renewable fuel CI values under the RTFO should be updated in line with those published in the RED II Annexes?	Agree ✓	
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Please provide your reasons.

Agree that RTFO should be consistent with RED II.

Q25. Do you agree or disagree with our proposal to remove the GHG emissions credit for cogeneration of electricity from the greenhouse gas saving methodology to prevent overstating the GHG emissions savings achieved by the finished fuel?	Agree	Disagree
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Please provide your reasons.

N/A

Q26. Do you agree or disagree that biomethane suppliers should be able to apply a GHG emissions saving credit for avoided emissions when calculating the carbon intensity of biomethane produced from manure?	Agree ✓	Disagree
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<p>Please provide your reasons.</p> <p>This provides a valuable opportunity to maximise methane reduction given it has 25x GWP of CO₂.</p>		

<p>Q27. Do you agree or disagree that when biomethane is created via the co-digestion of multiple feedstocks, the supplier should continue to be required to report the CI of each individual consignment? That is, the supplier should not be permitted to average the CIs across feedstocks, in line with the mass balance rules which apply to other biofuels.</p>	<p>Agree</p>	<p>Disagree</p>
<p>Please provide your reasons.</p> <p>N/A</p>		

<p>Q28. Do you agree or disagree with our proposal to update the fossil fuel comparator from 83.8 gCO₂e/MJ to 94 gCO₂e/MJ to better reflect the real world GHG emissions associated with fossil fuels?</p>	<p>Agree</p> <p>✓</p>	
<p>Please provide your reasons.</p> <p>This is a methodological requirement of RED II, therefore Zemo support this being adopted in the UK.</p>		

<p>Q29. Do you agree or disagree that we should update the minimum greenhouse gas saving thresholds to offset the impact of the revised fossil fuel comparator? This would prevent support for renewable fuels which have worse GHG emissions than those supported now.</p>	<p>Agree</p> <p style="text-align: center;">✓</p>	
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If you agree - do you agree with the levels of the new proposed GHG savings thresholds? If you disagree - please provide your reasoning.

Zemo supports this approach, it seems logical and pragmatic. It is essential to encourage biofuel suppliers to strive for higher carbon savings over time.

<p>Q30. Do you think we should consider introducing a tighter GHG emission savings threshold for fuels produced in new production facilities in the future? This would be in addition to the existing thresholds that we are proposing and would only apply to installations not yet built.</p>		<p>No</p> <p style="text-align: center;">✓</p>
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All renewable fuels should be obliged to meet the same RTFO sustainability and carbon criteria. Two tier systems should be avoided as its creates complexity and inconsistency

<p>Q31. If you answered yes to Q30 - what do you think the minimum GHG emission savings threshold should be and what should the start date be? Do you agree or disagree that we should increase the RFNBO GHG threshold to 65%?</p>	<p>Agree</p> <p style="text-align: center;">✓</p>	
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Zemo suggests DfT begins with a 65% GHG threshold for new plant rather than 55% and moving to 65% in the future. This would be beneficial from an investors perspective as financial decisions are made over long timeframes.

Q32. Do you agree or disagree with our proposal to add 'highly biodiverse forest and other wooded land which is species rich and not degraded' to the list of restricted land categories? This will increase existing environmental protections and keep pace with international protections.

Agree

✓

Q33: Do you agree or disagree that we should continue to allow the production and harvesting of biofuel feedstocks from 'highly biodiverse forest and other wooded land' when it can be demonstrated that the production and harvesting of the feedstock from the land was completed without compromising the land type's nature protection purposes?

Agree

✓

Please provide your reasons.

Q34. Do you agree or disagree with our proposal to update the definition of highly biodiverse grasslands to maintain consistency with other land types, international definitions, and to facilitate the continued use of voluntary schemes?

Agree

✓

This is essential to safeguard biodiversity. It is important that this definition is adoption across Government departments (eg Defra, BEIS) to ensure harmonisation of sustainability criteria.

Q35. Do you agree or disagree with our proposal to require that suppliers of biofuels produced from agricultural residues must demonstrate that monitoring and management plans are in place which address the impact of the removal and processing of the feedstock on the site's soil quality and soil carbon content?

Agree

Please provide your reasons.

N/A

Q36. Do you agree or disagree with our proposal to introduce new sustainability criteria specifically for feedstocks sourced from forest biomass? Note that this would mean that biofuels from forestry feedstocks will no longer be required to meet the land criteria, but instead would be required to meet specific forest criteria.

Agree

✓

Agree. It is essential that the most up to date and robust sustainability criteria are adopted for forest biomass. Zemo would like to highlight the importance of harmonisation across Government departments – DfT, DEFRA and BEIS, in terms of ‘sustainability’ definitions and criteria related to biomass feedstocks.

Q37. Do you agree or disagree that the proposed criteria better represent the specific environmental impacts associated with forestry?

Agree

✓

If you disagree, please provide your reasoning.

Q38. Do you agree or disagree that we should remove references to RED II Annex IX Part A from this definition?

Agree

Disagree

If you disagree, please provide your reasoning.

N/A

Q39. Are there any impacts that we have not foreseen?

Yes

No

If yes, please explain your reasoning and provide evidence.

N/A

Q40. Do you agree that the specified amount used in determining civil penalty amounts related to the main obligation, should change to twice the buy-out price? This would be in line with the development fuel obligation and previous obligation periods.	Yes	No
<p>If yes, please explain the reasons you agree. If you do not agree, please state what you think the multiplier should be, and why.</p> <p>N/A</p>		

Q41. We propose that RTFCs should not be awarded if the renewable fuel or chemical precursor benefits from other support schemes such as feed-in tariffs and premium payments. Do you agree that we should we further limit multiple reward of renewable energy and chemical precursors?	Yes	No
<p>Please provide reasoning and evidence for your answer.</p> <p>N/A</p>		

Q42. We have set out some circumstances where support in addition to that offered by the RTFO might be appropriate. These include if the production facility receives investment aid, including government grants or government loans. Should there be other exceptions when limiting multiple reward of renewable energy and chemical precursors?	Yes	No
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If yes, please list them and provide reasoning and evidence for your answer. N/A

Q43. Do you anticipate any unintended consequences with this change?

Yes

No

Please provide reasoning and evidence for your answer. N/A

Please provide reasoning and evidence for your answer.

Questions on the Cost benefit analysis (Annex B)

Q1. Do you think that the marginal fuel is still FAME UCOME biodiesel?	Yes	
The reasoning set out makes sense.		

Q2. Do you agree that the assumptions made within our modelling are reasonable?		Disagree
More assessment on the levels of electrification is required and the resulting impacts therefore a watching brief over the next few years will give rise to a better modelling approach.		