



Department
for Transport

RTFO Guidance Consultation for Year 8, April 2015 to April 2016: Government Response

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Executive summary

Summary of the consultation

The Renewable Transport Fuel Obligation (RTFO) is administered by the RTFO Unit in the Department for Transport (DfT). The Unit has developed the Renewable Transport Fuel Obligation Guidance (the "Guidance") to help suppliers and verifiers meet the requirements of the RTFO legislation. There are three main parts to the Guidance - covering process, carbon and sustainability, and verification - and a number of supporting annexes (see [link](#)).

The original consultation document proposed several updates to the Guidance for Year 8 of the obligation - including some important amendments (see Annex A) to reflect anticipated changes to the Renewable Transport Fuel Obligations Order 2007 (the "RTFO Order"), subject to the due Parliamentary process. These changes were subsequently adopted on 4 March 2015 and will apply from 15 April 2015.

In addition, the consultation sought views on how a number of forthcoming issues should be reflected in the Guidance, including the definition of highly biodiverse grassland (see [link](#)), and the new International Standard on Assurance Engagements (ISAE) 3000 (see [link](#)). General comments on the three main parts of the Guidance were also invited. The list of consultation questions is provided at Annex B.

The consultation document also provided an update on a number of other issues. These included: potential new fuel chains in the Renewable Energy Directive (RED); the definition of severely degraded land and heavily contaminated land; and the review by the RTFO Unit of how fuels extracted from a gas grid are treated.

The consultation ran from 11 December 2014 to 6 February 2015. See [link](#) for more information.

Responses received

The Department received nine responses in total. Respondents were broadly categorised as follows:

Comments	No. of responses
Small to medium enterprise (up to 50 employees)	1
Large company	5
Representative organisation	1
Trade union	0
Interest group	0
Local Government	0
Central Government	0
Police	0
Member of the public	0
Other (or not specified)	2
Total	9

Process Guidance

The majority of respondents who provided comments agreed that the proposed amendments to the Process Guidance were clear and provided sufficient detail for suppliers.

However, one respondent queried the use of interchangeable references to "biogas" and "biomethane" and requested a clearer definition of the product that would be eligible for the increased reward. Three respondents called for additional clarifications and guidelines as to the treatment of co-processed hydrotreated vegetable oil (cHVO) in order to prevent difficulties arising from an over-estimation of the renewable content, which could result in potential competitiveness impacts or fraud risks.

Carbon and Sustainability Guidance

The Department received a number of comments in relation to the forthcoming implementation of the highly biodiverse grassland definition.

One respondent queried the planned implementation of these requirements within an RTFO year, preferring instead implementation at the start of Year 9 (April 2016), and called for suppliers to be advised of any changes well in advance of the implementation date. One respondent also called for the RTFO Administrator to provide clear guidance as far in advance of 1 October as possible, should there be any implications for the operation of EU voluntary schemes.

One respondent expressed concern over the reference to "other grassland" in Article 2 of this Regulation. The respondent considered this to be extremely vague and stated that the Guidance would need to be clear as to who would adjudicate on whether other grassland could be considered or not. The respondent suggested that this should be the RTFO Unit, not simply the verifier, in consultation with suppliers, and that the process should be transparent.

The environmental importance of highly biodiverse grassland was emphasised by one respondent, who called for clear guidance on determining the biodiversity status, and suggested that the definition relate specifically to the National Vegetation Classification in order to avoid any confusion in the UK context.

The Department also received several general comments in relation to the Carbon and Sustainability Guidance. One respondent provided information on the treatment of renewable gas extracted from the gas grid in other Member States, and queried why UK developers should be constrained to using the gas grid average, stating instead that a mass balance approach would support the development of advanced biofuels in the UK. One respondent commented that it was of high importance that renewable fuels be both renewable and low carbon: any review must take this into account and close any loop holes.

In addition, one respondent suggested that the Government may want to consider using the new Guidance to place the RTFO in the context of the wider policy framework to reduce emissions of both atmospheric pollutants and greenhouse gases from transport.

Guidance for Verifiers

With regard to the Guidance for Verifiers, two respondents commented that the new version of the ISAE standard may result in increased costs for suppliers, for example through an increase in the hours worked by verifiers to comply with the new requirements, or reduced competition in the number of companies who can carry out such work.

One respondent commented that any amendments to the Guidance for Verifiers should be developed in consultation with the existing verifier group.

Government response

The Government would like to thank all those who responded to the consultation.

Process guidance

In response to the comments about the definitions of biogas and biomethane, we agree that the wording proposed in the consultation document could be further clarified and we will amend the Guidance accordingly.

In response to the comments made about cHVO, for the avoidance of doubt we will clarify that the fossil diesel component of the blended fuel¹ is not eligible for Renewable Transport Fuel Certificates (RTFCs) - it is only the HVO component which is deemed to be wholly renewable. The Administrator will require evidence on a case-by-case basis (i.e. either individual application or production plant level) to determine the split between the HVO and the fossil diesel in the blend.

Carbon and Sustainability Guidance

With regard to the comments about the highly biodiverse grassland definition, it is our view that a significant level of advanced notice has been provided to suppliers. This issue has, for example, been discussed at a number of supplier meetings hosted by the RTFO Unit.

The Department will be initiating work to analyse what, if any, amendments to the Guidance are necessary, and will work with suppliers and other interested parties on this. We will consult upon any such amendments as appropriate. We will take into account the views expressed by respondents, and recent advice from the European Commission to the voluntary schemes (see [link](#)). We are, however, unable to change the timing of implementation (1 October 2015) as this has been specified in a European Union Regulation, and so will apply as law across the EU from that date.

¹ cHVO is HVO that is processed together with crude oil to get a final fuel that is a blend of HVO and fossil diesel. The HVO element is the component that is deemed to be wholly renewable, not the fossil element of the fuel blend.

With regard to the comments on the treatment of renewable gas extracted from a gas grid, we have noted the information provided by respondents. Our review is ongoing, and we will share further relevant information with suppliers and other interested parties in due course.

We do not propose to make further amendments to the Guidance in response to the suggestion of widening the scope of the RTFO to include atmospheric pollutants that have direct health impacts. The Guidance relates to the RTFO legislation, which does not cover this issue, and therefore it would not be appropriate to include such matters.

We have passed these comments onto the section within the DfT that deals with atmospheric pollutants that have direct health impacts. This team works closely with Defra, the lead Government Department for air quality, and the Department of Health.

Guidance for Verifiers

With regard to the new ISAE 3000 standard, the Department will be initiating work to determine the necessary amendments to the Guidance, and will work with suppliers, verifiers and other interested parties on this. We will consult upon any such amendments as appropriate.

Next steps

The RTFO Unit will now proceed to update the Guidance for Year 8 of the scheme. This will be made available on the DfT website.

Part 1: Process Guidance

Overview

- 1.1** The consultation sought views on several proposed updates to the Process Guidance for Year 8 of the obligation, including some important amendments (set out in Annex A) to reflect anticipated changes to the RTFO Order (these changes were subsequently adopted on 4 March 2015).

Increasing the reward for certain renewable gaseous fuels to more closely reflect their higher energy content relative to the equivalent volume of liquid fuels

Question 1: Do you consider that the proposed amendments to the Process Guidance (see Annex A) are clear and provide sufficient detail for suppliers?

Summary of responses

Yes	No	Comments only	No response
4	0	1	4

- 1.2** The majority of respondents that provided a response to this question agreed that the proposed amendments to the Process Guidance were clear and provided sufficient detail for suppliers.
- 1.3** One respondent commented that the terms "biogas" and "biomethane" had been used interchangeably, and emphasised the need for a clearer definition of the product that would be eligible for 1.9 RTFCs. The respondent provided a suggested definition for "vehicle quality" biomethane (subject to the product not receiving support from any other policy instrument): a vehicle fuel which has been derived from biogas or from syngas and which has a minimum methane content of 90%.

Question 2: Do you have any other comments on how this proposed change to the RTFO Order should be reflected in the Guidance?

Summary of responses

Yes	No	No response
0	5	4

- 1.4** Respondents did not provide comments in relation to this question.

The alignment of the treatment of hydrotreated vegetable oil and fatty-acid-methyl-ester

Question 3: Do you consider that the proposed amendments to the Process Guidance (see Annex A) are clear and provide sufficient detail for suppliers?

Summary of responses

Yes	No	Comments only	No response
3	0	3	3

- 1.5** Several respondents welcomed the harmonised treatment of fatty-acid-methyl-ester and HVO.
- 1.6** Three respondents called for additional clarifications and guidelines as to the treatment of chVO in order to prevent difficulties arising from an over-estimation of the renewable content, which could result in potential competitiveness impacts or fraud risks. One respondent commented that the treatment of chVO should be assessed on a case-by-case basis.
- 1.7** These respondents stated that the input ratio of renewable and fossil raw materials can vary substantially, and this should be taken into account when determining to what extent the end product should be considered renewable.
- 1.8** Two of the respondents further added that, in HVO co-processing, the share of renewable carbon content defines the share of renewable content in the end product, and this could be calculated and reported using mass-balance book-keeping and fixed theoretical yields for renewable feedstock used in co-processing.

- 1.9** These respondents suggested this could also be verified through analysis of the carbon age, and commented that HVO products with 100% renewable carbon content should be considered 100% renewable.

Question 4: Do you have any other comments on how this proposed change to the RTFO Order should be reflected in the Guidance?

Summary of responses

Yes	No	No response
3	3	3

- 1.10** The majority of respondents did not provide specific comments in response to this question. Three respondents referred to answers given previously on cHVO.

Rounding by the Administrator of volumes to which RTFCs are issued; by the suppliers of volumes submitted to the Administrator; and of the obligation by the Administrator

Question 5: Do you consider that these proposed amendments to the Process Guidance (see Annex A) are clear and provide sufficient detail for suppliers?

Summary of responses

Yes	No	No response
5	0	4

- 1.11** Those respondents who provided comments agreed that the proposed amendments to the Process Guidance were clear and provided sufficient detail for suppliers.
- 1.12** One respondent commented that the changes were pragmatic and, in the context of annual volumes, would have a miniscule impact on obligations.

Question 6: Do you have any other comments on how these proposed changes to the RTFO Order should be reflected in the Guidance?

Summary of responses

Yes	No	No response
0	5	4

1.13 Respondents did not provide comments in response to this question.

General comments

Question 7: Do you have any other comments to make on the Process Guidance?

Summary of responses

Yes	No	No response
0	5	4

1.14 Respondents did not provide comments in response to this question.

Government response

1.15 In response to the comments about the definitions of biogas and biomethane, we agree that the wording proposed in the consultation document could be further clarified and the Guidance will be amended accordingly.

1.16 In response to the comments made about cHVO, for the avoidance of doubt we will clarify that the fossil diesel component of the blended fuel is not eligible for RTFCs - it is only the HVO component which is deemed to be wholly renewable.

1.17 The Administrator will require evidence on a case-by-case basis (i.e. either individual application or production plant level) to determine the split between the HVO and the fossil diesel in the blend. This evidence will need to include consideration of any HVO that is incorporated into other products produced by the refinery.

1.18 Should there be sufficient desire from the sections of industry that will produce cHVO, we will work with them to determine whether it is possible to develop generic methodologies that can be applied to each production run. As is always the case when considering volumes of renewable fuel that may lead to the issue of RTFCs, we will not be able to issue RTFCs until that volume is validated by the RTFO Unit.

Part Two: Carbon and Sustainability Guidance

Overview

2.1 The consultation did not propose significant amendments to the RTFO Carbon and Sustainability Guidance with effect from the start of Year 8. However, views were invited on how the European Union Regulation containing the definition of highly biodiverse grassland (see [link](#) for text), which applies from 1 October 2015, should be reflected.

Highly biodiverse grassland

Question 8: Do you have any comments on how this definition should be reflected in the Carbon and Sustainability Guidance, or in relation to the possible impact on suppliers?

Summary of responses

Yes	No	No response
4	1	4

2.2 One respondent queried the planned implementation of the highly biodiverse grassland requirements within an RTFO year, preferring instead implementation at the start of Year 9, and called for suppliers to be advised of any changes well in advance.

2.3 One respondent also commented that the RTFO Administrator should provide clear guidance to obligated suppliers as far in advance of 1 October as possible, should there be any implications to the operation of the ISCC scheme, or any other voluntary scheme recognised by the EU.

- 2.4 This would allow suppliers to be able to take account of any such voluntary scheme limitations in their feedstock selection plans as soon as is reasonable practicable. Suppliers would not want to source a biofuel in good faith via a voluntary scheme only for it to be rejected by the Administrator due to a misunderstanding of the treatment of the new EU Regulation within the applicable voluntary scheme.
- 2.5 One respondent expressed concern over the reference to "other grassland" in Article 2 of the Regulation. The respondent considered this reference to be extremely vague and suggested that the Guidance would need to be clear as to who would adjudicate on whether other grassland could be considered or not. They considered that this should be the RTFO Unit, not simply the verifier, in consultation with suppliers and that the process should be transparent.
- 2.6 Finally, one respondent emphasised the environmental importance of highly biodiverse unimproved and semi-unimproved grasslands, and called for suppliers and verifiers to have clear guidance on determining the biodiversity status. The definition in the Guidance should relate specifically to the National Vegetation Classification in order to avoid any confusion in interpretation in the UK context.

General comments

Question 9: Do you have any other comments to make on the Carbon and Sustainability Guidance?

Summary of responses

Yes	No	No response
3	4	2

- 2.7 One respondent provided information on the treatment of renewable gas extracted from the gas grid in other Member States, and questioned why UK developers should be constrained to using the gas grid average. A mass balance approach would support the development of advanced biofuels in the UK.

- 2.8** One respondent requested to be involved in any re-consideration of the approach to rewarding fuels made from grid gas. In their view, it was very important that renewable fuels were both renewable and low carbon: any review must take this into account and close any loop holes.
- 2.9** One respondent suggested that the Government may want to consider using the new Guidance to place the RTFO in the context of the wider policy framework to reduce emissions of both atmospheric pollutants and GHGs from transport. They emphasised that incentivising certain biofuels should not be seen as a substitute to encouraging measures to reduce overall fuel consumption.

Government response

- 2.10** In response to the comments about the highly biodiverse grassland definition, it is our view that a significant level of advanced notice has been provided to suppliers on this issue.
- 2.11** These provisions were present in the EU Renewable Energy Directive, as finalised in 2009. We have discussed on a number of occasions at our RTFO supplier meetings that the definition was under development, and consulted with industry regarding the wording of the Regulation whilst this was being debated between Member States and the Commission. Finally, although the Regulation was adopted in December 2014, it does not apply until 1 October 2015. This is precisely to allow suppliers and voluntary schemes time to implement any changes necessary.
- 2.12** Suppliers should also be aware that, as an EU Regulation, these provisions will apply as law across the whole of the EU from 1 October 2015 and therefore to not apply them in the UK from that date would be counter to EU law.
- 2.13** The Department will be initiating work to analyse what, if any, amendments to the Guidance are necessary, and will work with suppliers and other interested parties on this. We will consult upon any such amendments as appropriate. We will take into account the views expressed by respondents, and recent advice from the European Commission to the voluntary schemes.

- 2.14** With regard to the comments on the treatment of renewable gas extracted from a gas grid, we have noted the information provided by respondents. Our review is ongoing and we will share further relevant information with suppliers and other interested parties in due course.
- 2.15** We do not propose to make further amendments to the Guidance in response to the suggestion of widening the scope of the RTFO to include atmospheric pollutants that have direct health impacts. The Guidance relates to the RTFO legislation, which does not cover this issue, and therefore it would not be appropriate to include such matters.
- 2.16** We have passed these comments onto the section within DfT that deals with atmospheric pollutants that have direct health impacts. This team works closely with Defra, the lead Government Department for air quality, and the Department of Health.

Part Three: Guidance for Verifiers

Overview

- 3.1 The consultation document highlighted that a new version of ISAE 3000 has been published. This is the standard to which verification under the RTFO must be undertaken. This will come into force in December 2015 and can be [found here](#).
- 3.2 The consultation asked for views on the scale of the likely impacts of this change to ISAE 3000.

New version of ISAE 3000

Question 10: Do you anticipate that the new version of ISAE 3000 will have an impact on the ability of fuel suppliers to find a suitable verifier to provide a verification report under the RTFO?

Summary of responses

Yes	No	Comments only	No response
0	3	1	5

- 3.3 Those respondents who provided comments did not anticipate that the new version of ISAE 3000 would impact on the ability of fuel suppliers to find a suitable verifier.
- 3.4 Two respondents commented that the new version of the ISAE standard may result in increased costs for suppliers, for example through an increase in the hours worked by verifiers to comply with the new requirements, or reduced competition in the number of companies who can carry out such work. There was also risk that such an increase in costs could ultimately be passed on to the consumer.
- 3.5 One of the respondents felt this change was likely to be more challenging for smaller suppliers, and stated that this should be taken into consideration when consulting on any future changes to the Guidance for Verifiers.

Question 11: Are there any other changes to ISAE 3000 which may have an impact on the operation of the RTFO?

Summary of responses

Yes	No	No response
0	3	6

- 3.6** The majority of respondents did not provide comments in response to this question.
- 3.7** One respondent commented that any amendments to the Guidance for Verifiers should be developed in consultation with the verifier group. The respondent also stated that the DfT should clearly define its expectations, to ensure that all interested parties are able to suitably satisfy the requirements of the revised ISAE 3000, DfT and individual organisations operating restrictions.

Question 12: Do you have any other comments to make on the Guidance for Verifiers?

Summary of responses

Yes	No	No response
0	4	5

- 3.8** Respondents did not provide any comments in response to this question.

Government response

- 3.9** With regard to the new ISAE 3000 standard, the Department will be initiating work to determine the necessary amendments to the Guidance, and will work with suppliers, verifiers and other interested parties on this. We will consult upon any such amendments as appropriate.

Annex A: Amendments to Process Guidance proposed in original consultation document

- A.1** The table below details the main amendments to the RTFO Process Guidance for Year 8 that were proposed in the original consultation document.
- A.2** There will now be further amendments following the consultation, as indicated in the Government response above.

Year 7 Guidance (Chapter/paragraph)	Amendments proposed in original consultation document
<p>Executive summary, para 9</p> <p>"One certificate may be claimed for every litre (or kilogram in the case of biogas) of sustainable renewable fuel supplied."</p>	<p>"One certificate may be claimed for every litre of sustainable liquid renewable fuel supplied. For biogas, 1.9 RTFCs may be claimed per kilogram of biomethane supplied, and 1.75 RTFCs will be issued per kilogram of biobutane or biopropane (or for a combination of both). For any other biogas, 1 RTFC will be issued per kilogram supplied."</p>
<p>Chapter 2</p>	<p>New para inserted after 2.6:</p> <p>"The Administrator will round a supplier's obligation up or down to the nearest whole litre."</p>
<p>Chapter 2, para 2.14</p> <p>"Fatty-acid-methyl-ester (FAME) produced from fossil methanol is regarded as a wholly renewable fuel under the RTFO and is treated as such in the determination of the eligibility for certificates. It only has to be proven that the sustainability criteria were met for the part of the fuel produced from renewable feedstocks."</p>	<p>"Fatty-acid-methyl-ester (FAME) produced from fossil methanol, hydrotreated vegetable oil (HVO), a form of renewable diesel, and co-processed hydrotreated vegetable oil (cHVO) are regarded as wholly renewable fuels under the RTFO and are treated as such in the determination of the eligibility for certificates. It only has to be proven that the sustainability criteria were met for the part of these fuel types produced from renewable feedstocks."</p>

<p>Chapter 2, para 2.21</p> <p>"All calculations to determine the volume of renewable fuel should be rounded to the nearest litre."</p>	<p>"When reporting to the Administrator calculations to determine the volume of renewable fuel should be rounded to the nearest litre. This rounding requirement applies to all volumes of fuel, to include the notional fossil as well as notional renewable volumes associated with a given volume of partially renewable fuel."</p>
<p>Chapter 4, para 4.26</p> <p>"One RTFC will be issued per kilogram of gaseous renewable transport fuel or renewable part of a gaseous partially renewable transport fuel that meets the requirements set out above, except where 4.27 applies."</p>	<p>"The energy content of gaseous fuels is typically significantly higher than that of liquid biofuels. Therefore 1.9 RTFCs will be issued per kilogram of biomethane supplied, and 1.75 RTFCs will be issued per kilogram of biobutane or biopropane (or a combination of both biobutane and biopropane) supplied, where the fuel meets the requirements set out above. For any other biogas, 1 RTFC will be issued per kilogram supplied. The exception being where 4.27 applies."</p>
<p>Chapter 4, para 4.27</p> <p>" Two RTFCs will be issued per litre of renewable or renewable part of partially renewable transport fuel or per kg of renewable or renewable part of partially renewable gaseous transport fuel, where that fuel meets the requirements above and that fuel has been produced from feedstocks that are wastes, residues, ligno-cellulosic or non-food cellulosic materials. See Guidance Part Two: Carbon and Sustainability Guidance for further information on which feedstocks fall into these categories."</p>	<p>"Two RTFCs will be issued per litre of renewable or renewable part of liquid partially renewable transport fuel where that fuel meets the requirements above and that fuel has been produced from feedstocks that are wastes, residues, ligno-cellulosic or non-food cellulosic materials. For gaseous fuel produced from feedstocks that are wastes, residues, ligno-cellulosic or non-food cellulosic materials, the number of certificates will be doubled to 3.8 and 3.5 RTFCs per kilogram of biomethane and biobutane or biopropane (or a combination of both biobutane and biopropane) respectively (for any other gaseous fuel produced from feedstocks that are wastes, 2 RTFCs would be issued per kilogram). See Guidance Part Two: Carbon and Sustainability Guidance for further information on which feedstocks fall into these categories."</p>
<p>Chapter 4</p>	<p>New para inserted after 4.27:</p> <p>"As a consequence of how RTFCs are issued for renewable gaseous fuels (see para 4.26), the Administrator will apply rounding when issuing RTFCs. Rounding will be applied to each administrative consignment rather than to each litre. In practice this means an approved application for 100,001 kilograms of biomethane (from single counting material) would be multiplied by the kilograms: litres factor of 1.9, which gives an entitlement to 190,001.9 RTFCs. As 0.9 of an RTFC cannot be issued, this will be rounded to 190,002 RTFCs."</p>

Annex B: List of consultation questions

Question 1

Do you consider that the proposed amendments to the Process Guidance (see Annex A) are clear and provide sufficient detail for suppliers?

Question 2

Do you have any other comments on how this proposed change to the RTFO Order should be reflected in the Guidance?

Question 3

Do you consider that the proposed amendments to the Process Guidance (see Annex A) are clear and provide sufficient detail for suppliers?

Question 4

Do you have any other comments on how this proposed change to the RTFO Order should be reflected in the Guidance?

Question 5

Do you consider that these proposed amendments to the Process Guidance (see Annex A) are clear and provide sufficient detail for suppliers?

Question 6

Do you have any other comments on how these proposed changes to the RTFO Order should be reflected in the Guidance?

Question 7

Do you have any other comments to make on the Process Guidance?

Question 8

Do you have any comments on how this definition should be reflected in the Carbon and Sustainability Guidance, or in relation to the possible impact on suppliers?

Question 9

Do you have any other comments to make on the Carbon and Sustainability Guidance?

Question 10

Do you anticipate that the new version of ISAE 3000 will have an impact on the ability of fuel suppliers to find a suitable verifier to provide a verification report under the RTFO?

Question 11

Are there any other changes to ISAE 3000 which may have an impact on the operation of the RTFO?

Question 12

Do you have any other comments to make on the Guidance for Verifiers?