



Department
for Transport



Call for evidence on starch slurry

Introduction

Low grade starch slurry is currently eligible for double reward under the RTFO. Following concerns raised by industry, the growth in claimed volume and the time that has elapsed since our initial assessment, we are conducting a call for evidence on whether this feedstock is eligible for double reward.

Why are we conducting this call for evidence?

Whilst the Department wishes to encourage the supply of feedstocks that are eligible for double reward under the RTFO, we need to be satisfied that these materials meet the required criteria for such support. This includes reviewing the eligibility for double reward as and when appropriate.

This call for evidence is as a result of:

- The lapse of time since the initial assessment, which occurred in December 2012;
- The significant growth in the volume of ethanol derived from low grade starch slurry since 2012;
- Concerns raised by industry that the volumes being supplied cannot all be sourced from low grade starch slurry; and
- Concerns raised by industry as to whether starch slurry meets the criteria for double reward.

Background

Initial assessment

An assessment of the eligibility for double reward of low grade starch slurry was made in 2012, with the material being added to our [list of wastes and process residues](#) in December 2012.

Current description

The description on our list requires that, in order to be double rewarded, *"it can be demonstrated that there is no other economically viable end use"* and that suppliers may be asked for *"evidence that this material is unsuitable for other end uses, such as animal feed."*

All claims for support for ethanol derived from low grade starch slurry have been covered by voluntary scheme proof of compliance with the sustainability criteria.

DfT position on reviewing double reward status

Section 9.14 of the RTFO Guidance Part Two: Carbon and Sustainability Guidance; states *"The RTFO Administrator may periodically review and update the tables on the Department's website to add new substances, or if sufficient evidence emerges to indicate that a substance should be treated differently."* As four years have elapsed since our initial assessment and the volume of supply has increased significantly, we consider it prudent to review our decision.

Reported volume of bioethanol derived from low grade starch slurry under the RTFO

Operating period	Country of origin	Sum of volume litres
14/04/13	Belgium	4,259,868
14/04/13 Total		4,259,868
14/04/14	Belgium	4,048,699
	France	15,764,430
	Netherlands	51,351
14/04/14 Total		19,864,480
14/04/15	Belgium	34,077,854
	France	41,812,587
	Netherlands	1,162,563
14/04/15 Total		77,053,004
14/04/16	Belgium	45,009,029
	France	82,306,038

	Germany	1,224,757
	Netherlands	2,032,954
	Poland	1,220,672
14/04/16 Total		131,793,450
14/04/17 (to date)	Belgium	4,525,872
	France	27,650,674
14/04/17 Total		32,176,546

Call for evidence

Other end uses

The double reward status of a feedstock is primarily determined by whether or not there are other economically viable end uses for a material. This is a matter that we are asking for evidence upon.

Q 1 Are you aware of any instances where starch slurry could be considered of 'no other economically viable end use'?

If so, please provide evidence when replying.

Classification

The Department would like to re-examine the criteria which can be used to determine which classifications of starch slurry may be eligible for double reward. Industry classifications appear to use letters of the alphabet to denote particle size. Whilst there is some variance, A, B, C, D and Z seem to be commonly used classifications.

However, which classification a particular particle size (and hence an individual consignment of material) falls into appears to be company/production facility specific.

Q 2 Are there any objective classifications that clearly and consistently define what constitutes a starch slurry with no other economically viable end use? If this is not possible at an industry wide scale, do you consider it to be possible at a company/production facility scale?

If so, please provide evidence when replying.

Starch slurries from different feedstocks

The current definition does not differentiate between different feedstocks that have given rise to starch slurry. We are aware that there are a variety of starch slurries (for example wheat, maize and potato) which can be processed in a variety of different of ways and may have different end uses.

Q 3 Are there different inputs and subsequent processes that can affect whether starch slurry derived from different feedstocks can be used for any other end uses?

If so, please provide examples when replying.

Land use criteria

Biofuels derived from wastes and residues (that are eligible for double counting) are considered to have automatically met the land use criteria. Land use is not therefore required to be reported to the Administrator. Furthermore, the boundary of the GHG calculation for the material starts at the point that the waste or residue arises (e.g. the processing plant).

For all other materials the boundary of the GHG calculations need to start at the point of origin of the crop (i.e. field).

Should our review determine that either starch slurry should not be double rewarded or result in a definition whereby some starch slurries are double rewarded and others aren't, we would like to understand the economic consequences associated with this. This includes any possible impacts upon suppliers that may have long term contracts.

Q 4 If we were to determine that some or all low grade starch slurry should no longer be double rewarded, what would you consider a reasonable notification period before reverting to single counting?

Please explain why such a notification period should be given, and provide evidence where possible.

Q 5 If some or all low grade starch slurry were to single count, would you consider it feasible to report land use criteria for starch slurry?

If not, please provide evidence when replying.

Any other evidence

Q 6 Is there any other information or evidence you would like considered?

Next steps / timing

Please provide all responses by 14th March 2017.

Responses can be sent to; RTFO-compliance@dft.gsi.gov.uk

We intend to have reviewed the opinions and evidence submitted by the end of March 2017.

We will then engage with organisations / individuals for clarification as necessary.

We will consider whether it is necessary to seek further views on any of the opinions and evidence provided from other parties. Should this be necessary we will seek those views during the latter part of March.

We aim to have come to a conclusion by the end of April 2017.

Confidentiality of evidence provided

Please state whether you wish any information you provide to be treated confidentially. In order to facilitate a robust consideration we may wish to seek opinions upon the evidence and opinions provided. Our assessment will take into account whether we've been able to obtain independent verification. It will therefore it will greatly facilitate our assessment if respondents seeks to claim commercial confidentiality for the minimum amount of evidence necessary to protect their interests.