Department for Transport

Extending RTFO eligibility to new development fuels and seeking evidence on low carbon fuels policy

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Foreword

This Government must meet the climate challenge. And our country needs solutions. We have just experienced what is likely to have been the hottest summer on record, at the same time as the cost-of-living crisis. Lifting growth and living standards will require a new approach, rebuilding the resilience of our communities and reindustrialising our regions.

Complex challenges require multi-faceted solutions. Decarbonisation must be coupled with job creation. New technologies need to integrate with older systems, and there needs to be a managed transition from the old ways to the new ways without leaving people and places behind.

Our economy relies on connection, but connectivity comes at a cost. Surface transport is the biggest source of UK greenhouse gas emissions each year, but it is also a sector with the technological capability to make some of the biggest advances into a greener economy with the least disruption.

The UK has long been at the forefront of supporting low carbon fuels in transport. The Renewable Transport Fuel Obligation (RTFO) has been driving their use in surface transport since 2008 with the Sustainable Aviation Fuel (SAF) Mandate extending this support to the aviation sector since 2025.

Although the future of road transport is electric, low carbon fuels have a key role to play in transport decarbonisation, with significant volumes of low carbon fuels needed for roads out to 2050 and for aviation beyond that.

Low carbon fuels are a shining example of what can be achieved through collaboration between Government, industry and academia. Innovative low carbon fuels are being delivered at pace, at scale, to forecourts throughout the nation, utilising existing infrastructure. Although almost invisible to consumers, low carbon fuels already deliver significant carbon savings.

This consultation marks the next phase in our plans to deliver a sustainable future for fuel and transport as we seek to respond to suggestions which could support UK production and investments in the supply of innovative fuels.

The elements of this consultation and call for evidence reflect the growing confidence within industry that new pathways and fuels will be supplied in the next few years.

I am acutely aware of the need to take a pragmatic and balanced approach to decarbonisation, reflecting the need to protect households from the cost of living at the same time as to set a clear signal of the opportunity for growth for our domestic industry. I am therefore intending to publish a wider consultation on the RTFO, including on targets, in 2027.

The task of decarbonising road transport is a significant one. This is why enabling low carbon fuels as part of this solution is so important. We look forward to continuing to collaborate closely with stakeholders as we develop our policy in the knowledge that this approach will be key to our success.

Executive summary

Background

The Renewable Transport Fuel Obligation (RTFO) is the Government's primary policy for supporting the use of low carbon fuels in surface transport.

In August 2025, following a call for evidence, the Government published the *RTFO Statutory Review and the future of the scheme: summary of responses and policy update*.[1] Building on the review we are consulting on some key topics.

The first part of this document is a consultation which covers some of those topics. This includes: broadening the RTFO to include fuels produced from nuclear energy; and adding fuel used in hydrogen fuel cell mobile generators to the list of eligible non-road transports. The consultation section also includes new policy changes in response to subsequent stakeholder asks: consulting on adding methane when it is also a renewable fuel of non-biological origin (RFNBO) to the list of eligible development fuels; and on options for changing the requirements related to blending development fuels into petrol and diesel.

The UK must meet legally binding carbon budgets as we progress towards net zero. Decarbonising the fuels covered by the RTFO, alongside the transition to zero emission vehicles, will be key to delivering this. Government therefore intends to consult on RTFO targets in 2027. The consultation will take into account low carbon fuel and feedstock availability alongside carbon budget delivery and affordability.

The second and third parts of this document are a call for evidence to support further policy development. This includes the future of specific development fuel pathways under the RTFO, and scheme administration which applies equally to the RTFO and SAF Mandate schemes.

[1] https://www.gov.uk/government/calls-for-evidence/rtfo-statutory-review-and-future-of-the-scheme

Summary of content

Part 1: RTFO – consultation topics

The RTFO has specific rules as to the eligible end uses for fuels and the types of fuel that can receive certificates, both for the main and development fuel obligations. It is important to keep eligibility rules under review to ensure they remain appropriate and consistent. This is particularly the case where technology is progressing, leading to new pathways for the production and use of renewable and low carbon fuels. Feedback from several stakeholders, through both the 2025 RTFO call for evidence and subsequent engagement, has highlighted specific areas where policy changes should be considered to ensure consistency, and help the RTFO better meet its overall objectives.

The consultation therefore seeks views on the topics listed below.

1.1 Widening the RTFO to include new eligible fuels and end uses

1.1.1 Adding nuclear-derived fuels as an eligible development fuel

Nuclear-derived fuels (NDFs) are low carbon fuels that are produced using nuclear energy. This can include hydrogen and derivatives produced from nuclear power. They are therefore similar to fuels that the RTFO already supports under the eligibility criteria for renewable fuels of non-biological origin (RFNBOs), which traditionally use solar or wind power as their energy feedstock.

In 2023, the 2004 Energy Act was amended to permit support for nuclear-derived fuels, under renewable transport fuel obligations, and they were duly included as eligible fuels when the SAF Mandate began in 2025. This consultation therefore proposes to align the RTFO with the SAF Mandate by including NDFs as an eligible fuel type for all eligible transport modes within the development fuel obligation.

1.1.2 Adding RFNBO methane from renewable energy as an eligible development fuel

The development fuel obligation already supports synthetic methane where it is produced from either pyrolysis or gasification processes and other RFNBO fuels. To bring RBNBO methane in line with the treatment of other advanced low carbon fuels we are consulting on extending development fuel support to include RFNBO methane produced from renewable energy (such as solar or wind). This would be extended to methane produced from nuclear energy should the RTFO be amended to include that fuel source for all eligible transport modes.

Low carbon methane (biomethane, RFNBO methane, synthetic methane) from various production routes and feedstocks can be used in road transport, primarily as fuel for commercial heavy goods vehicles designed to run on compressed or liquified gas.

1.1.3 Extending the definition on non-road transports to include mobile generators powered by hydrogen fuel cells

Hydrogen fuel cell mobile generators are a new technology that can help to decarbonise the temporary supply of electricity in various use cases, for example at construction sites. While mobile generators that use internal combustion engines are categorised as non-road transports eligible under the RTFO, fuel cell alternatives are not covered by the current RTFO Order. For consistency, we are therefore consulting on adding hydrogen fuel cell mobile generators to the list of eligible non-road transports.

1.1.4 Other fuels and feedstocks

We are keen to understand if there are other emerging low carbon fuels and feedstocks which should be considered for RTFO development fuel support.

1.2 Minimum blend requirement for development fuels

1.2.1 The development fuel eligibility requirement for fuels to meet a 25% minimum blend in petrol or diesel

For fuels that are blended with petrol or diesel to qualify as development fuel they must currently demonstrate that they can be blended to at least 25% by volume with the finished fuel still meeting existing fuel standards. This requirement is intended to ensure that these development fuels are genuine ‘drop-in’ fuels, which can be supplied to the existing internal combustion engine (ICE) vehicle fleet.

Stakeholders have suggested that proving this can be complex, costly and the need to meet such a significant threshold increases risks for projects that are trying to secure funding. We are therefore consulting on possible lower blending thresholds and welcome stakeholder feedback on these.

Part 2: RTFO - Call for evidence on hydroprocessed and co-processed fuels under the RTFO

This publication also includes a call for evidence on a number of topics. These areas are where government needs further information from stakeholders before developing further policy and possible formal consultation on changes. These topics are listed below.

2.1.1 RTFO - call for evidence on hydroprocessed fuels

Hydroprocessed fuels are eligible for development fuel certificates and therefore receive significantly more support than low carbon fuels that receive support under the main obligation. The development fuel obligation was designed to encourage and justify the higher levels of investment that new and innovative fuel production pathways require to become commercialised. However, hydroprocessing fossil fuels with low carbon hydrogen does not require the same level of investment as other development fuel pathways, and

there is concern that continued growth in supply of these fuels could limit the deployment of fuels that require greater capital investment and operating costs.

We recognise that changing the eligibility of an existing fuel pathway could create uncertainty for investors, fuel producers and suppliers. Removing eligibility from the most widely supplied development fuel pathway could also increase rates of buy-out in the short term and reduce greenhouse gas (GHG) emission savings achieved under the obligation.

We are therefore seeking evidence on the appropriate level of support for hydroprocessed fuels.

2.1.2 RTFO - call for evidence on co-processed fuels

We have also seen a small amount of development fuels being supplied whereby the feedstocks have been co-processed alongside traditional fossil crudes in existing oil refineries. We recognise the benefits of utilising existing technology and infrastructure to produce development fuels and are therefore committed to continue supporting co-processing as a development fuel pathway.

Currently, there is limited evidence as to their potential future supply and we are keen to understand the magnitude of their future contribution to transport fuel decarbonisation.

Part 3: RTFO and SAF Mandate - call for evidence on scheme administration

The final part of this document is a call for evidence covering powers to prevent fraud and non-compliance; the role of end users in the supply chain; and how the scheme and stakeholders are impacted by issues such as obligated supplier insolvency.

Next steps

This consultation and call for evidence is open for 10 weeks and closes on 7 February 2027. We plan to publish a summary of responses setting out the government’s decisions and next steps later this year.

How to respond

The consultation period began on the 27th November 2026 and will run until 7th February 2027. Please ensure that your response reaches us before the closing date.

Please send consultation responses to:

lowcarbonfuel.consultation@dft.gov.uk

Postal address:

RTFO team

Great Minister House

33 Horseferry Road

London

SW1P 4DR

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 for others who may wish to be involved in this process, contact us.

Freedom of Information

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the Freedom of Information Act 2000 (FOIA) or the Environmental Information Regulations 2004.

If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the Data Protection Act (DPA) and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

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What data we are collecting and how we will use it

We are processing the following personal data:

- Email addresses

Personal data is required to inform responders of the publication of the government response.

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Under data protection law, the lawful basis for processing your data is:

Article 6(1)(e) – public task

Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

How long we retain the data

Your personal data will be kept securely by DfT; once you have been informed of the publication of the government response, your personal data will be deleted.

Further information

For more information about your rights in relation to your personal data, how to complain or how to contact the DfT Data Protection Officer, view our Personal Information Charter.

Introduction

The Renewable Transport Fuel Obligation (RTFO)

The RTFO reduces greenhouse gas (GHG) emissions in surface transport by supporting the use of low carbon fuels. The scheme decarbonises vehicles that use internal combustion engines while we transition to zero emission alternatives. It is an important policy lever in the delivery of the UK's carbon budgets.

The RTFO was introduced on 15 April 2008 and has been updated and revised throughout its operation. The RTFO places annual obligations on fossil fuel suppliers, requiring a certain percentage of their supply to comprise low carbon fuels. Obligation periods run from 1 January to 31 December each year. It applies to any supplier of fuel for relevant transport modes who supplies more than 450,000 litres of total relevant fuel including both eligible and fossil fuel for use in the UK, in an obligation period. The relevant transport modes under the RTFO eligible to receive RTFCs are:

- Road vehicles;
- Non-road transports including non-road mobile machinery (NRMM), such as mobile generators and machinery, or alternatively powered trains and tractors;
- In maritime, if the fuel used is a renewable fuel of non-biological origin (RFNBO).

The fossil fuels obligated by the RTFO include:

- Petrol;
- Diesel;
- Gas oil, and;
- The non-eligible portion of any partially eligible fuel.

And the following eligible low carbon fuels are eligible to receive RTFCs:

- Biofuel;
- Renewable fuels of non-biological origin (RFNBO);
- Recycled carbon fuels (RCFs), and;
- The eligible portion of any partially eligible fuel.

The RTFO has two components: the main obligation, which supports traditional biofuels such as bioethanol, biodiesel and biomethane; and the development fuel obligation, which incentivises innovative and advanced low carbon fuels. The development fuel obligation aims to unlock additional GHG savings by accessing feedstocks that would otherwise not be used in the main obligation because the technology to process them into low carbon fuels is new and more costly.

In 2024, 3.8 billion litres equivalent[2] of low carbon fuel was supplied under the RTFO scheme, making up almost 8% of total fuel supplied to road and non-road transport[3]. Supply of these fuels in place of fossil fuels led to savings of just under 7.9 million tonnes of CO2 equivalent (MtCO2e) (excluding indirect land use change (ILUC). [4, 5]

The RTFO statutory review

In August 2025, the Government published the RTFO Statutory Review – a summary of responses to the RTFO call for evidence and a policy update. This document committed to a future consultation on key aspects of the scheme:

- RTFO targets
- How fuels are rewarded
- The development fuel obligation
- Support for nuclear-derived fuels and hydrogen fuel cell powered mobile generators.

Earlier this year we communicated to stakeholders that, due to challenging market conditions facing the fuel sector and uncertainty over future fuel prices, we were not able to consult on changes to RTFO targets or how fuels are rewarded at that time. We now intend to consult on targets in 2027.

In the meantime, we wish to progress a number of other policy areas. These are generally concerned with eligibility criteria for fuels and end uses within the development fuel obligation and provide support to more nascent technologies where development and investment would benefit for greater legislative clarity within the RTFO scheme. This consultation is therefore focused on these changes and are set out below.

This consultation and call for evidence

The statutory review process generated a number of policy proposals to incentivise novel fuels and nascent technologies. These proposals aim to enhance RTFO support and diversify low carbon fuel supply by changing eligibility criteria.

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[2] Gaseous fuels supplied are converted to litres equivalent for reporting purposes.
[3] Department for Transport, 2026. Renewable Transport Fuel Obligation (RTFO) statistics 2024: Final report
[4] Department for Transport, 2026. Renewable Transport Fuel Obligation (RTFO) statistics 2024: Final report
[5] These GHG estimates reflect well-to-wheel (fuel lifecycle) emission savings and as a result differ to UK carbon budget reporting accounting. This includes the emissions of combustion, from electricity use, from feedstock cultivation, fuel production, transport and distribution, etc. More complete detail can be found in the RTFO Compliance Guidance.

This consultation considers:

- Extending eligibility to include fuels produced from nuclear energy, also known as nuclear-derived fuels (NDFs).
- Including RFNBO methane from renewable energy (synthetic methane, e-methane) feedstocks as an eligible development fuel.
- Extending the list of eligible non-road transports to include mobile generators powered by hydrogen fuel cells.
- Reviewing the petrol and diesel 25% minimum blend requirement for development fuel eligibility.

These changes would support emerging technologies and fuel production / use pathways. As the changes do not alter the overall target levels within the scheme, they would not add further costs or burdens to obligated suppliers or the end user and are likely to have limited direct impact on scheme compliance in the near term. They would provide some certainty to those companies looking to invest and develop these pathways towards commercial viability. The proposals also reduce regulatory burdens on demonstrating fuel eligibility. We are therefore progressing this work ahead of any future consultation on targets.

Part 2 is a call for evidence section that seeks views on areas of the scheme where further policy development may be needed. This includes whether certain production pathways being utilised to produce development fuels meet the aims of the development fuel obligation and whether adjustments to eligibility criteria would better support those aims.

Part 3 of this document is a call for evidence covering powers to prevent fraud and non-compliance; the role of end users in the supply chain; and how the scheme and stakeholders are impacted by issues such as obligated supplier insolvency.

Next steps

The consultation will run for 10 weeks closing on the 7th February 2027.

We plan to publish a summary of responses and next steps in 2027.

Part 1: Consultation on new eligible fuels and end uses under the RTFO

Background

The RTFO has specific rules as to the eligible end uses for fuels and the specific types of fuel that can receive development fuel certificates. It is important to keep these rules under review to ensure they remain appropriate and consistent. This is particularly the case where technology is progressing, leading to new pathways for the production and use of renewable and low carbon fuels. Feedback from several stakeholders, through both the RTFO call for evidence in 2024 and subsequent engagement, has highlighted specific areas where change may be required.

The topics explored in the consultation are focused on facilitating the supply of strategically important development fuels and ensuring eligibility criteria are fit for the future of the scheme.

Consultation topics

1.1 Widening the RTFO to include new eligible fuels and end uses

The low carbon fuel industry has identified some types of low carbon fuel and end use applications which are not currently eligible as development fuels but appear to be in line with the objectives of the development fuel obligation. The intention of the development fuel obligation is to:

- Stimulate the production and supply of strategically important, advanced low carbon fuels, that can be used without the need for vehicle adaptation, helping to drive decarbonisation in sectors where there are fewer alternatives;
- Reduce reliance on ‘traditional’ biofuels, where feedstocks are limited and are likely to become more so as demand increases;
- Increase the range of fuels derived from wastes or residues (given these have lower risks of environmental impact such as land use change and avoid competition with food/feed crops);

- Encourage development of new fuel pathways by accessing feedstocks that are otherwise not used in the main obligation because the technology is new and expensive;
- Increase the supply of drop-in fuels (low carbon fuels that avoid the blend walls that limit conventional biodiesel and bioethanol).

In order for a fuel to be classed as a development fuel, both the feedstock and the fuel must meet certain criteria.

The fuel must be one of the following:

- A biofuel made from a waste or residue that is eligible for double Renewable Transport Fuel Certificates (RTFCs)[6] and that meets the RTFO's sustainable criteria. Fuels produced from segregated oils and fats, such as used cooking oil and tallow, are excluded, as these feedstocks are already widely used and can be easily converted into FAME biodiesel;
- A renewable fuel of non-biological origin, for example, hydrogen made from renewable energy;
- An eligible recycled carbon fuel feedstock.

Eligible fuels must be one of the following:

- A fuel that can be blended at rates of at least 25% whilst meeting either the fuel
- standard for diesel (EN590) or petrol (EN228)[7];
- Hydrogen;
- Substitute natural gas (SNG).

Broadening the criteria to make new fuels eligible could increase the supply of development fuels, reduce buyout, and therefore increase GHG savings. The next section of this consultation considers potential new eligible fuels and end uses identified through the 2024 RTFO call for evidence and wider engagement.

1.1.1 Nuclear-derived fuels

Nuclear-derived fuels (NDFs) are produced using energy generated from nuclear sources to drive processes such as electrolysis. This enables the creation of low carbon fuels, including hydrogen and derivatives like power to liquid fuels.

The RTFO already supports low carbon hydrogen and power to liquid fuels, but only when they are produced from renewable energy, such as solar and wind. These fuels are classed as renewable fuels of non-biological origin (RFNBOs).

[6] Department for Transport, 2026. RTFO and SAF Mandate list of feedstocks including wastes and residues.
[7] The European standard for petrol and diesel, ensuring low sulphur content.

Fuels produced using nuclear energy are not currently eligible. Like RFNBOs, NDFs are produced from low carbon electricity so they have the potential to play a role in decarbonising transport fuels.

In the 2023 Energy Act, an amendment was made to the 2004 Energy Act which permitted renewable transport fuel schemes to support fuels derived from nuclear energy. This allowed NDFs to be included as an eligible fuel under the SAF Mandate when it began in 2025.

We propose aligning the RTFO with the SAF Mandate by including NDFs as an eligible fuel.

As with the SAF Mandate, NDF eligibility would mirror that of RFNBOs, with the same criteria applying to assessments of fuel (including additionality requirements). The same reward as RFNBOs receive through the RTFO scheme would also be provided to NDFs. This means that where NDFs, such as hydrogen or drop in road fuels, are produced, they would be eligible for support as development fuels in the same way as RFNBO fuels. Equally, NDFs that do not meet the development fuel criteria, such as ammonia, would be eligible for support under the main obligation.

Potential impact of widening the eligibility of development fuels to include nuclear-derived fuels

Low carbon fuel production capacity data suggests RFNBO use in road fuels will remain limited in the short term, constituting up to 2% of anticipated low carbon fuel global production capacity in 2030[8]. In addition, the deployment of new nuclear capacity, for both large scale nuclear facilities and small modular reactors (SMRs), takes time. For these reasons, this policy proposal is not expected to result in a significant short-term increase in development fuel volumes. However, as the grid decarbonises and UK nuclear production in the UK ramps up, NDFs could play a role in decarbonising transport.

Any deployment of eligible NDFs into transport which is rewarded under the RTFO could help reduce the current level of buy-out and increase GHG emissions savings. As any supply would be likely to displace buy-out, it would not increase the overall costs associated with the scheme, but rather reduce buy-out costs. In any case, expanding eligibility of fuel options would not be punitive as fuel suppliers will still have the option to supply an alternative fuel and/or buy-out.

We are not aware of any imminent plans to use nuclear power to produce RTFO-qualifying fuels, so we expect the immediate impact of expanding eligibility to be limited. However, this fuel pathway could become viable in the future as new nuclear capacity comes online.

We welcome further information on future deployment of nuclear-derived fuels to aid analysis of this policy proposal.

[8] Argus Media, 2026. Analysis by DfT. Fuel production estimates.

Q1. Do you agree or disagree that nuclear-derived fuels should be eligible under the RTFO? Please provide any additional evidence on the future deployment of nuclear-derived fuels.

1.1.2 RFNBO methane from renewable energy

RFNBO methane from renewable energy, (also known as synthetic methane or e-methane) is methane produced from low carbon hydrogen and CO_2. RFNBO methane is not currently eligible for development fuel certificates, although it would be eligible for main obligation certificates. However, RFNBOs in the form of hydrogen as well as synthetic natural gas produced from either gasification or pyrolysis are eligible. Through both the 2024 RTFO call for evidence and wider stakeholder engagement, RFNBO methane has been highlighted as a potential source of emission reductions in the NRMM and HGV sectors as it can be deployed in gas engines. RFNBO methane is a novel fuel pathway that utilises emerging technology to produce 'drop-in' fuels, which do not compete with existing fuel pathways.

The development fuel obligation already supports synthetic methane where it is produced from either pyrolysis or gasification processes and other RFNBO fuels. We are therefore proposing to include RFNBO methane produced from renewable energy (such as solar or wind) as an eligible development fuel. Note, if nuclear-derived fuels are also included in the RTFO, as proposed earlier in this consultation, methane produced from nuclear power would also be eligible under the scheme.

Potential impact of widening the eligibility of development fuels to include RFNBO methane

As previously referenced, low carbon fuel production capacity data suggests RFNBO use in road fuels will remain limited in the short term, constituting up to 2% of anticipated low carbon fuel global production capacity in 2030[9]. RFNBO methane is a nascent technology, and projects are in the early stages of development. For these reasons, introducing RFNBO methane eligibility to the RTFO is not expected to result in a significant increase in development fuel volumes in the short term. However, this change provides an important signal to the market, and as RFNBO methane technology develops, our understanding of future supply scenarios will improve.

Any deployment of eligible RFNBO methane into transport which is rewarded under the RTFO could help reduce the current buy-out and increase GHG emissions savings. As any supply would be likely to displace buy-out, it would not increase the overall costs associated with the scheme but rather reduce buy-out costs. In any case, expanding eligibility of fuel options would not be punitive as fuel suppliers will still have the option to supply an alternative fuel and/or buy-out.

RFNBO methane production is a new technology with limited commercial deployment to date. We are aware of projects in the UK looking to expand RFBNO methane production

[9] Argus Media, 2026. Analysis by DfT. Fuel production estimates.

and transport is a possible end use for this fuel, as RFNBO methane can be used in existing methane gas powered vehicles on the road today.

We welcome further information on future deployment of RFNBO methane to aid analysis of this policy proposal.

Q2. Do you agree or disagree that RFNBO methane should be eligible under the development fuel obligation?

1.1.3 Hydrogen fuel cell mobile generators

A hydrogen fuel cell produces electricity by combining hydrogen and oxygen in an electro-chemical reaction, rather than by combustion. Its only by-products are water and heat, making it a clean power source. Hydrogen used in fuel cells was approved as an eligible fuel under the RTFO in vehicles in 2018; however, this amendment did not cover non-vehicle use. This means that, despite fuel cell technology being eligible in the majority of NRMM end-uses, it is not eligible for use in mobile generators. We are now proposing that hydrogen should also be eligible for reward when used in fuel cell mobile generators, bringing it in line with the rules for biofuels used in mobile generators.

Mobile generators are an important part of off-road mobile machinery. As their purpose is supplying electricity for use in temporary off-grid locations, their options for decarbonisation are more limited than other modes. It is therefore important that they are able to access support for a range of decarbonisation options.

Potential impact of widening the eligibility of development fuels to include hydrogen fuel cell generators in non-road mobile machinery

Any deployment of eligible hydrogen which is rewarded under the RTFO could help reduce the current level of buy-out in the development fuel obligation and increase GHG emissions savings. As any supply would be likely to displace buy-out, it would not increase the overall costs associated with the scheme but rather reduce buy-out costs. In any case, expanding eligibility of fuel options would not be punitive as fuel suppliers will still have the option to supply an alternative fuel and/or buy-out.

Low carbon fuel use in non-road mobile machinery (NRMM) which are specifically generators is constrained by demand of fuels of this mode generally. Generators are estimated to contribute around 1 MtCO2e to UK emissions in 2021[10], which is equivalent to 345 million litres, or 0.8% of total petrol and diesel consumption.

Whilst hydrogen is expected to play a relatively small role in the decarbonisation of road vehicles, there is potential for fuel cells to make a more significant contribution to NRMM decarbonisation due to the wide range of vehicles and equipment covered by the sector. Although in the short term, this change is not expected to result in a significant increase

[10] DfT estimate using evidence from an NRMM decarbonization feasibility study.

in development fuels, demand from hydrogen fuel cell generators could support the emergence of supply over the longer term.

Q3. Do you agree or disagree that low carbon hydrogen used in hydrogen fuel cell mobile generators should be eligible under the RTFO?

1.1.4 Other fuels and feedstocks

The proposals and options outlined above are those most consistently highlighted by stakeholders, and the proposed changes aim to bring the RTFO up to date with the latest technological developments in fuel production. However, there may be other fuels and feedstocks, which align with the development fuel objectives, that are under development or could be supplied in the next few years.

Q4. Are there any further low carbon fuels or feedstocks which you think should be included as eligible under the development fuel obligation? Please provide evidence to support your response.

1.2 Minimum blend requirement for development fuels

One of the eligibility requirements under the development fuel obligation is that, where low carbon fuels are blended into petrol or diesel, fuel must be capable of being blended at rates of at least 25% whilst meeting either the fuel standard for diesel (EN590) or petrol (EN228). The criterion was introduced to ensure that these fuels are advanced drop-in fuels which can be supplied to the existing internal combustion engine (ICE) vehicle fleet. These fuels are therefore not subject to blend limits unlike conventional biofuels like FAME biodiesel and bioethanol which are limited to 7% in diesel and 10% in petrol, respectively, so have the potential for being scaled up and delivering significant GHG savings.

1.2.1 Minimum blend level

Currently, to meet the requirement to supply development fuel which can be blended at 25%, it is only necessary to demonstrate that this level of blending is possible. Not every consignment of fuel needs to contain at least 25% low carbon fuel for it to be eligible for development fuel certificates.

The minimum blend requirement was included, to ensure that these development fuels were genuine ‘drop-in’ fuels, which could be supplied to the existing internal combustion engine (ICE) vehicle fleet. Whilst this rationale is still relevant, we recognise that demonstrating this can be challenging for some development fuel pathways, especially in the earlier phases of projects. In response to the RTFO call for evidence in 2024, some stakeholders said that the 25% threshold is too high, creating a barrier to investment in certain development fuel technologies. They highlighted that demonstrating compliance at this level requires costly process adjustments, while there remains a risk that the 25% blend level may not be met. This can deter early-stage projects. They also suggested that the requirement resulted in the need for additives which would not otherwise be needed in order for the final fuel to remain within specifications.

We are therefore consulting on reducing the current minimum blend requirement in the development fuel eligibility criteria. Following stakeholder feedback, we would like to understand if this would facilitate increased development fuel supply.

Any reduction in the minimum blend level must not inadvertently allow waste-derived ethanol or methanol to be classified as development fuel, as these fuels are already produced at scale and do not require the level of capital investment to warrant development fuel support. Development fuels should also not reduce the ability for fuel suppliers to blend these existing fuels. It is also important that development fuels can be deployed at scale, which means that the lower limit for the minimum blending requirement should remain above 10%. Some forms of biodiesel, like hydrotreated vegetable oil (HVO), are already able to be blended at higher levels. However, as the development fuel eligibility criteria does not allow fuels derived from segregated oils and fats, HVO is already excluded from the development fuel obligation.

The minimum blend level will therefore need to be above 10% and not more than the current 25% requirement. We would like to hear from stakeholders where between those figures the minimum blend requirement should be set.

Potential impact of a reduced minimum blend level

Responses to the 2024 RTFO call for evidence suggested that lowering this threshold could facilitate a greater supply of co-processed development fuels, particularly given challenges associated with demonstrating compliance with this pathway. However, we hold no quantitative evidence to suggest that lowering the 25% blending requirement would increase the supply of development fuels, so there is uncertainty in the likely impact on the development fuel supply in the short term.

Any deployment of development fuel into transport which is rewarded under the RTFO could reduce the current level of buy-out in the development fuel obligation and increase GHG emissions savings. As any additional supply would be likely to displace buy-out, it would not increase the overall costs associated with the scheme but rather reduce buy-out costs.

To aid analysis of this policy proposal, we welcome any further information on future deployment of drop in development fuels that could be delivered as a result of the proposed change in minimum blend requirements.

Q5. At what level between >10% and 25% should the minimum feasible blend level within the petrol and diesel standards be set at for development fuel eligibility, and why?

Please provide evidence where necessary to support your response.

Part 2: Call for evidence on hydroprocessed and co-processed fuels under the RTFO

Introduction

In recent years, new production processes have been used to produce low carbon fuels. These processes were not considered when the eligibility criteria for the development fuel obligation were developed ahead of implementation in 2018. We are seeking further information from stakeholders on two processes which relate to the production of low carbon fuels alongside existing fossil fuel production.

The normal refinery processing of crude oil to make fossil fuels includes several hydrogen-based processes, which is called hydroprocessing. This call for evidence considers the eligibility of fuels where low carbon hydrogen is used to process crude oil feedstocks, without the introduction of renewable carbon.

Co-processing is the process of adding low carbon feedstocks, such as used cooking oil or tyre pyrolysis oil, into a fossil fuel refinery process, alongside traditional crude oil. A proportion of the carbon in the finished fuel has therefore come from low carbon sources.

2.1 Hydroprocessing of fossil fuels with low carbon hydrogen

Under the RTFO development fuel obligation, there is an eligible fuel pathway which involves the introduction of renewable hydrogen during the hydroprocessing of fossil fuels. It is our understanding that this hydrogen is largely produced from municipal solid waste and other organic waste feedstocks to create biomethane. This biomethane is then used in a steam methane reformer to create renewable hydrogen. The renewable hydrogen replaces existing fossil (grey) hydrogen in the fuel refining process. As such, it may not require any changes to the refinery process, or investment in additional infrastructure at the point of production.

The supply of hydroprocessed low carbon fuels has been growing since 2021 - the provisional 2025 RTFO statistics indicate that almost 50% of the development fuel obligation is likely to be met with fuel produced via hydroprocessing. Figure 1 shows the different feedstocks supplied under the RTFO's development fuel obligation. The feedstocks which we understand are regularly used to make biomethane for

hydroprocessing are organic municipal solid waste, sewage sludge, contaminated cheese washings, waste water from meat processing plants and some food waste. While individual feedstocks may be used in different fuel production pathways, our understanding is that the majority of biogenic wastes suitable for biomethane production shown in this chart are currently processed into fuel using hydroprocessing.

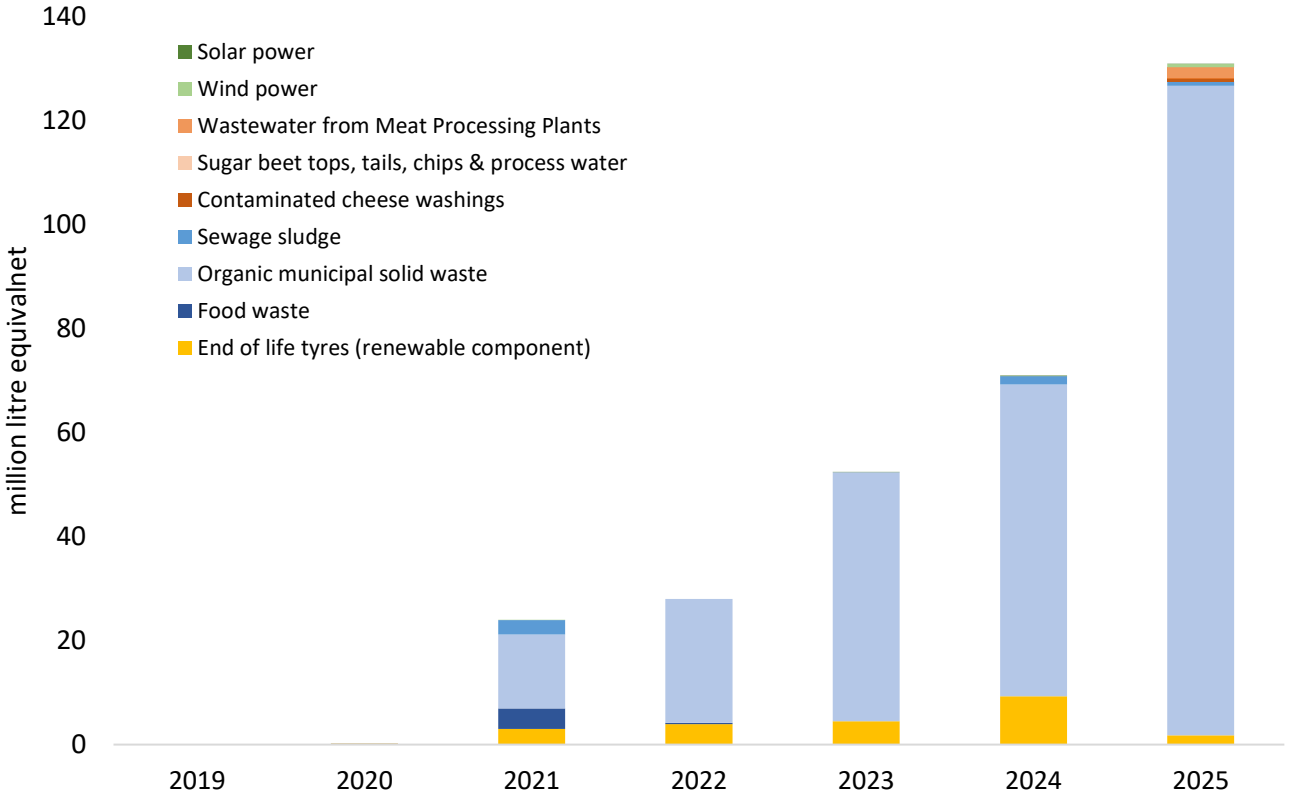


Figure 1. Development fuel supported by the RTFO, by feedstock type

Source: Department for Transport, 2026. Renewable Transport Fuel Obligation (RTFO) statistics. Fifth provisional release[11]

Considerations

Stakeholders have identified both benefits and concerns associated with hydroprocessed fuels using low carbon hydrogen.

Benefits

Using renewable or other low carbon hydrogen in traditional fossil fuel refineries helps to reduce the carbon intensity of the fossil fuels they produce. Given the development fuel obligation is still seeing significant buy-out, the supply of hydroprocessed fuels produced

[11] All provisional data contain fuel volumes which are cross verified with HMRC data. However, as suppliers can provide their data up to 7 months after the obligation period ends, all data published prior to the final report for each obligation period is subject to change.

using low carbon hydrogen is therefore delivering additional GHG savings that would likely not be realised under the main obligation, as those targets are already being met through alternative fuels.

Where existing sources of biomethane are utilised, the low capital investment requirements of this pathway could support continued growth in supply. Stakeholders have also suggested that the support available will encourage further investment in biomethane production and could support production that would otherwise be unviable.

Disbenefits

Biomethane as a transport fuel is already supported through the main RTFO obligation, so supporting its use in refineries via the development fuel obligation could be seen as diverting this biomethane for more lucrative support. Where existing sources of biomethane are used, the net GHG emissions benefit is uncertain, given additional processing is required to extract the low carbon hydrogen element and then use that in hydroprocessing.

By its nature, this process also relies on the production of fossil fuels rather than the development of standalone low carbon fuel production facilities. At the same time, only a small fraction (less than 5%) of renewable energy can be imparted into the finished fuel, limiting the total GHG emissions savings that can be achieved through this pathway.

Concerns have also been raised as to whether ongoing support for a pathway that requires comparatively little capital investment could affect investment incentives for other development fuel pathways, which require more advanced technological solutions with higher risks, and the opportunity to produce drop-in alternatives to fossil fuels that are more compatible with the transition to net zero.

The RTFO and the SAF Mandate account for these fuels in different ways. Under the RTFO, renewable fuels like HVO are considered 100% renewable, even where the hydroprocessing utilises fossil (grey) hydrogen. The SAF Mandate, however, treats hydroprocessing as a process input, which impacts the carbon intensity of the final fuel rather than contributing to the renewable volume of fuel. This means fossil fuels that use renewable energy for hydroprocessing are not eligible under the SAF Mandate, while renewable fuels can improve their carbon intensity and increase their reward under the Mandate’s GHG reward mechanism.

It is also important to note that, if production of hydroprocessed fuel using low carbon hydrogen happens outside the UK, the GHG savings achieved by the fuel will not be allocated to UK carbon budgets due to the way international carbon accounting operates. GHG emissions savings from biomethane are accounted for where the biomethane is injected into the grid, rather than on use/combustion of the final fuel.

We are therefore seeking further evidence from stakeholders on this pathway, as we consider its status as an eligible development fuel.

Q6. What evidence can you provide regarding the future availability of hydroprocessed development fuels?

Q7. Do you support the inclusion of hydroprocessed fuels using low carbon hydrogen in the development fuel obligation? Please explain your rationale.

2.2 Co-processed development fuels

We have also seen a small amount of development fuels being supplied whereby the feedstocks have been co-processed alongside traditional fossil crudes in existing oil refineries. We remain committed to supporting co-processed development fuels which are already playing a key role in the supply of development fuels (and SAF) today. While the capital investment is not on the same scale as for standalone low carbon fuel plants, with the potential to incrementally increase co-processing levels in stages, we recognise that it can still involve significant technical challenges and investments, whilst delivering significant GHG savings. We also recognise that these pathways have the potential to achieve higher levels of renewability within their fuels

Currently, there is limited evidence as to their potential future supply and we are keen to understand the magnitude of their future contribution to transport fuel decarbonisation. We are therefore seeking evidence on the potential future supply of co-processed development fuels.

Q8. What evidence can you provide regarding the future availability of co-processed development fuels?

Part 3: Call for evidence on administration of the RTFO and SAF Mandate schemes

3.1 Powers to prevent fraud and non-compliance

Low carbon fuel supply chains can be long and complex, involving a range of actors and often spanning multiple countries and continents. Low carbon fuels are also subject to incentives through schemes such as the RTFO, within which biofuels from eligible wastes and residues receive double the reward compared to crop-derived biofuels. These factors increase the risk of fraud and non-compliance and have led to concerns over the provenance of certain low carbon fuels and feedstocks supplied to the European market. This therefore has implications for fuel supplied to the UK.

Schemes like the RTFO and SAF Mandate have strict sustainability criteria enshrined in legislation[12] and supported by a robust compliance framework. This includes third-party verification of every consignment of fuel and the widespread use of voluntary certification schemes to provide assurance throughout the supply chain. In DfT, we augment this by undertaking additional investigations: we work closely with other renewable fuel regulators, voluntary schemes, verifiers and auditors to share information and promote compliance.

DfT has recently taken measures to strengthen assurance controls, including increasing the resources available for investigations; introducing a dedicated recognition process for voluntary schemes and third-party verifiers; and clarifying guidance around the use of voluntary schemes and our powers to investigate the full supply chain.

As part of the wider consultation on the Common Biomass Sustainability Framework[13], UK Government also asked for views on a range of measures that could improve monitoring, reporting and verification.

In addition to that work, we welcome input from stakeholders on the effectiveness of current controls and any further actions that could be taken. This could include placing further requirements on voluntary certification schemes such as those proposed in the Common Biomass Sustainability Framework consultation. Alternatively, stakeholders may

[12] i.e. The Renewable Transport Fuel Obligations Order 2007 and The Renewable Transport Fuel Obligations (Sustainable Aviation Fuel) Order 2024

[13] Department for Energy Security and Net Zero, 2025 Common biomass sustainability framework

wish to share their experiences of deploying new technological innovations such as digital traceability.

We are also interested to hear from suppliers on their experience of engaging with the chain of custody investigation process – where we seek evidence from the full supply chain – and views on requiring information to be provided more quickly to enable faster resolution of such investigations.

Q9. In your view, how effective are current regulations and powers available to the scheme administrator in preventing and countering fraud? How could this be improved?

Q10. In your view could the chain of custody investigation process be improved or clarified for suppliers, and if so, how?

Q11. How could new technologies such as digital traceability be employed to improve confidence? What is the role of Government in enabling this?

3.2 The role of end users in the supply chain

Actors across the supply chain have a critical role to play in supporting the integrity of supply chains and environmental claims. For example, those who purchase and use low carbon fuels are in a powerful position, particularly as we increasingly see large operators of vehicle fleets and machinery looking to directly procure low carbon fuels. These end users have a responsibility to promote and incentivise best practice. This is imperative for ensuring confidence and integrity is maintained in the low carbon fuel industry as a whole and some end users are already coming together to develop their own sourcing best practice.[14]

A key means by which end users can support this endeavour is by being intelligent customers for the fuels they purchase. At its core, this involves employing curiosity and healthy scepticism over the environmental claims being made. By building knowledge of supply chains, asking for evidence, and doing their own checks, end users can have greater confidence in the fuel they are using as well as play their part in promoting strong compliance.

Below, we outline a number of potential actions that end users could take to enhance confidence in the integrity of supply chains and environmental claims. We welcome views on the feasibility and effectiveness of these actions, suggestions for additional measures, and the role government could play in supporting implementation or removing barriers. This feedback could help inform the development of future best practice guidance.

There are some key things which any end user can look out for when purchasing low carbon fuels:

- **Meeting national requirements:** Ensure that the fuel has met national requirements and criteria (e.g. has it been awarded Renewable Transport Fuel Certificates under

[14] Action Sustainability, 2024 Responsible Sourcing of HVO Report

the RTFO?). A list of RTFO and SAF Mandate registered companies is also available on gov.uk.[15]

- **Supply-chain certification:** The vast majority of low carbon fuel supplied in the UK is certified through a voluntary scheme recognised as meeting the UK's sustainability criteria.[16] End users can ask to see voluntary scheme certificates and proofs of sustainability. End users can check a fuel supplier or producer's voluntary scheme certificate online, which will also show if a certificate has been withdrawn. For instance, the list for ISCC is available here.

- **Downstream supply chain certification:** Voluntary certification schemes generally *stop* at the point at which the fuel is claimed under a scheme like the RTFO/SAF Mandate, meaning that documentation is not always available to end users. Downstream certification, like the Zemo's Renewable Fuel Assurance Scheme (RFAS) can help fill in that gap.[17]

End users can also choose to go further, for example:

- **Fuel testing:** It is possible to use radiocarbon "C-14" testing to determine the fossil versus biogenic content of the fuel. Alongside robust supply chain certification, this can give more confidence that the fuel is indeed renewable. Mass and energy balance rules can mean that the renewable fuel supplied might legitimately show as being fossil carbon, but in these cases the fuel supplier should be able to explain *why* this is the case and demonstrate traceability.

- **Ask questions and ask for evidence:** Asking curious and informed questions about the provenance of consignments of fuel can help to improve scrutiny. These could be as simple as information relating to where the fuel came from, who produced it and from what feedstock (end users could then check if their supplier and/or fuel producer are certified under a voluntary scheme). End users could also ask for more information and evidence concerning what controls fuel suppliers have in place to have oversight and maintain the integrity of their upstream supply chain. This helps to promote best practice further up the supply chain.

- **Conduct own surveillance:** An operator could agree with actors in their supply chain to carry out site visits or commission their own third-party auditors. As traceability becomes increasingly digitised, and fuel users demand greater transparency, it may be possible to explore innovative digital routes to have greater oversight of a supply chain.

Finally, should anyone in the supply chain have specific concerns about consignments of fuel supplied under DfT schemes, they should contact DfT's Low Carbon Fuel Delivery Unit at rtfo-compliance@dft.gov.uk or saf-compliance@dft.gov.uk.

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[15] Department for Transport, 2025 RTFO registered companies
[16] Department for Transport, 2025 List of voluntary schemes approved for the RTFO and SAF Mandate
[17] Zemo Partnership, 2025 Renewable Fuels Assurance Scheme

Q12. Do you have any views on the role of fuel purchasers in the supply chain and the potential actions described above or any additional actions? Are there any barriers to taking any of the actions suggested?

Q13. Do you have any views on what Government can do to help and enable end users to take these actions or help overcome any barriers?

3.3 Impacts of obligated suppliers entering insolvency proceedings

Following recent insolvencies, stakeholders have expressed concerns regarding the impacts on their business, and on our schemes.

In the instance of an obligated supplier entering insolvency proceedings, strict rules about how assets and liabilities are dealt with apply. In the context of our schemes, any outstanding obligation is treated as a liability, and any certificates are assets. Certificates can be sold on the market to realise their value. Given that liabilities are treated in a priority order, and that an RTFO/SAF Mandate obligation would not be near the top of that order, it is unlikely that any obligation a supplier in insolvency proceedings had accrued would be met in full, if at all.

In a situation where a supplier in insolvency proceedings has not redeemed their certificates against their obligation, there will be excess certificates in the market. This may reduce the amount of low carbon fuel supplied in the year and/or the subsequent obligation year and therefore the GHG savings from the scheme. In turn, this could have financial impacts on low carbon fuel suppliers. As obligation years are not closed until the September following the end of the calendar obligation year, it is possible that obligations arising in two years could be unmet. As certificates can be carried forward to meet up to 25% of the following year's obligation, the impacts can also be carried further forward.

The size of the supplier in insolvency proceedings, how many certificates are held and the timing of the insolvency relative to the obligation year end will all affect the extent of the impacts.

In 2025, two fuel suppliers obligated under the RTFO entered insolvency proceedings and did not meet the obligations they had already incurred for 2024 or 2025 (either by redeeming the certificates they owned or by paying the buy-out). This meant that their certificates remained assets of the company and could be realised or transferred in accordance with the insolvency process, including being traded with other obligated parties. Stakeholders have expressed concerns that this impacted the demand for low carbon fuels, and that this would lead to a reduction in GHG savings. There is the potential for impacts to continue into 2026.

Laws governing insolvency proceedings mean that we are unable to directly address how certificates owned by insolvent companies are traded by amending the RTFO and SAF Mandate schemes. Once insolvency proceedings start, control over certificates shifts to the insolvency regime, and the RTFO and/or SAF Mandate schemes and/or their Administrator cannot dictate their use or prevent their trading.

However, it may be possible to amend the RTFO and/or SAF Mandate to reduce some of the impacts.

Given that some of the impacts arise from the provision of flexibilities in the scheme – such as, fuel suppliers being able to balance their obligation over a year; being able to trade certificates freely; the administrative period beyond the end of the year; and the ability to carry certificates over to the following year - some mitigations would be likely to reduce these flexibilities. Note that it would not be possible to amend the legislation in response to a specific instance of a supplier entering insolvency proceedings, rather, that any changes in flexibility, such as reduced carryover of certificates, would need to be permanent aspects of the schemes.

To take one of the potential mitigations as an example - the use of certificates carried over from the previous obligation period to meet suppliers' obligations in the RTFO is typically around 5%, and so much lower than the 25% permitted. Reducing the level of permitted carry over of certificates could limit the ability for certificates to be sold during an obligation period and therefore mitigate the impact of a supplier entering insolvency proceedings. Any change would need to consider the likelihood and scale of any potential future insolvency against the impact on compliance strategies. We would therefore like to understand if obligated parties would prefer to retain the flexibility of being able to meet up to 25% of their obligation with certificates from the previous year, or if a reduction in carry over would be preferable to limit the potential impacts of any supplier going into administration. We would also like to understand if there are differing views for the SAF Mandate given it is a new scheme for which the market is still establishing.

We are interested in understanding how obligated suppliers entering into insolvency proceedings has impacted different groups of stakeholders. We would like to understand whether stakeholders wish for DfT to further explore changes to the RTFO and/or SAF Mandate that could mitigate impacts of suppliers entering insolvency proceedings, noting that these are likely to involve limiting flexibilities with the scheme, and whether there are any additional ways to mitigate the impacts.

Q14. Has your organisation ever been impacted in any of the ways mentioned above, by an obligated fuel supplier entering insolvency proceedings? If so, please explain how, giving financial information where possible.

Q15. Would you support further policy development, such as reduced carryover of certificates, to mitigate the impacts of supplier insolvency on the RTFO and SAF Mandate? Please explain your reasoning.

Q16. Do you have any suggestions of ways to reduce the knock-on impacts of obligated supplier insolvency that may be feasible to implement within the RTFO and/or SAF Mandate? Please explain with evidence.

What will happen next

A summary of responses, including the next steps, will be published as soon as possible in 2027. Paper copies will be available on request.

If you have questions about his consultation please contact:

RTFO team

Great Minister House

33 Horseferry Road

London

SW1P 4DR

Alternatively, you can email lowcarbonfuel.consultation@dft.gov.uk

Annex A: Full list of consultation questions

Q1. Do you agree or disagree that nuclear-derived fuels should be eligible under the RTFO? Please provide any additional evidence on the future deployment of nuclear-derived fuels.

Q2. Do you agree or disagree that RFNBO methane should be eligible under the development fuel obligation?

Q3. Do you agree or disagree that low carbon hydrogen used in hydrogen fuel cell mobile generators should be eligible under the RTFO?

Q4. Are there any further low carbon fuels or feedstocks which you think should be included as eligible under the development fuel obligation? Please provide evidence to support your response.

Q5. At what level between >10% and 25% should the minimum feasible blend level within the petrol and diesel standards be set at for development fuel eligibility, and why? Please provide evidence where necessary to support your response.

Q6. What evidence can you provide regarding the future availability of hydroprocessed development fuels?

Q7. Do you support the inclusion of hydroprocessed fuels using low carbon hydrogen in the development fuel obligation? Please explain your rationale.

Q8. What evidence can you provide regarding the future availability of co-processed development fuels?

Q9. In your view, how effective are current regulations and powers available to the scheme administrator in preventing and countering fraud? How could this be improved?

Q10. In your view could the chain of custody investigation process be improved or clarified for suppliers, and if so, how?

Q11. How could new technologies such as digital traceability be employed to improve confidence? What is the role of Government in enabling this?

Q12. Do you have any views on the role of fuel purchasers in the supply chain and the potential actions described above or any additional actions? Are there any barriers to taking any of the actions suggested?

Q13. Do you have any views on what Government can do to help and enable end users to take these actions or help overcome any barriers?

Q14. Has your organisation ever been impacted in any of the ways mentioned above, by an obligated fuel supplier entering insolvency proceedings? If so, please explain how, giving financial information where possible.

Q15. Would you support further policy development, such as reduced carryover of certificates, to mitigate the impacts of supplier insolvency on the RTFO and SAF Mandate? Please explain your reasoning.

Q16. Do you have any suggestions of ways to reduce the knock-on impacts of obligated supplier insolvency that may be feasible to implement within the RTFO and/or SAF Mandate? Please explain with evidence.

Annex B: Consultation principles

The consultation is being conducted in line with the Government's key consultation principles which are listed below. Further information is available at https://www.gov.uk/government/publications/consultation-principles-guidance

If you have any comments about the consultation process please contact:

Consultation Co-ordinator
Department for Transport
Zone 1/29 Great Minster House
London SW1P 4DR
Email consultation@dft.gsi.gov.uk