

## RTFA response to the Jet Zero Consultation

This response is made on behalf of an organisation, see below. It was developed during two discussion sessions with the members of the RTFA's Aviation Working Group, and the draft response shared with members for written comment.

The Renewable Transport Fuel Association was formed in 2020, to create a strong voice for the interests of renewable and low carbon fuels.

The RTFA's membership comprises all the prospective SAF project developers known (to us) and most of the companies shortlisted for the Green Future Green Skies Competition. A full list of members is appended to this submission.

We welcome the opportunity to respond to this consultation.

We are confining our answers to the questions posed in the section on Sustainable Aviation Fuels (SAF), on pages 26 – 29 of the consultation document. Our answers to those questions are brief, as the content and arguments are covered in far greater detail in our response to the SAF Mandate Consultation.

Before addressing the questions, we have some comments about the definition of Sustainable Aviation Fuel in this and related consultations – specifically on the subject of used cooking oil (UCO) and bioethanol feedstocks.

In this **Jet Zero consultation** it refers to SAF as being produced from three types of feedstock, of which biomass is one. It does not go into detail on the definition of biomass (in particular whether crop-based feedstocks such as those used for bioethanol would be regarded as suitable feedstocks or not). It does, however, give used cooking oil as example of biogenic waste for the production of SAF.

In the Government's response to its recent consultation on the **Renewable Transport Fuel Obligation** there is mention that ethanol feedstocks can be used to create aviation fuel<sup>1</sup>, and that their availability will increase as demand in road transport declines. This suggests that the DfT regards crop-based ethanol as a suitable feedstock for aviation fuel in the longer run. Timing will be important however, just as it is with UCO.

At present the RTFO includes aviation fuel when made from wastes or RFNBOs, but rules out segregated oils and fats, e.g. UCO - and rightly so. This is to prevent UCO from being diverted from decarbonising road transport in order to decarbonise aviation. This is sensible as UCO has greater carbon reducing impact when used to make biodiesel than it does when used as a feedstock for aviation fuel. When the SAF mandate takes over from the RTFO (and aviation fuel is no longer supported under the latter) UCO *will* be eligible. However, avoiding diversion of UCO

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<sup>1</sup> Page 20 of the Government's response to the RTFO consultation states

"A decline in renewable road fuel would increase biomass availability in the later 2020s. Both the waste-derived biodiesel feedstocks and the ethanol feedstocks can be used to create aviation fuel, with the appropriate processing technologies. This presents us, and UK industry, an opportunity to push forward the transition of feedstocks currently used for road fuel to other sectors."

from road transport will remain an important consideration until such time as demand for biodiesel in road transport decarbonation falls, whereupon it should be encouraged into aviation fuel.

This logic can also be applied for crop-based bioethanol. However, we note that crop-based bioethanol is *not* regarded as eligible in the SAF mandate, even in the long run. This appears to be a contradiction, and we would like to explore that with DfT officials.

7. Do you agree or disagree with the overall approach for the development and uptake of SAF in the UK?

Broadly we support the overall approach, but it is important to note that a mandate on its own is unlikely to have any immediate impact on the development of SAF production; a mechanism to make SAF projects financeable is more urgent. Without it, the UK will merely import SAF, with missed opportunities with respect to value-adding and a worsening of balance of payments. The priorities should be:

1. A price support mechanism to make early UK-located SAF projects financeable (e.g. CfD).
2. The inclusion of Recycled Carbon Fuels within the RTFO.
3. Engagement through ICAO to establish a global mandate and framework.
4. A SAF mandate to provide a foundation for the longer-term market.

8. What further measures are needed to support the development of a globally competitive UK SAF industry and increase SAF usage?

The most critical measure is the introduction of a mechanism which provides price clarity and thus enables the financing of UK-located SAF plants. A Contracts for Difference mechanism is the best tool for this purpose of which we are aware; it would provide the necessary price certainty to investors and lenders, while ensuring value for money and allowing the Government to target support where it is most needed.

Bringing Recycled Carbon Fuels into the RTFO (and thus into the future SAF mandate and CfD mechanisms) is also important, not only because it would help the economics of SAF projects, but also because it would drive the right actions in relation to these wastes: ensuring that the carbon within them is used to maximum benefit.

In addition to revenue support from these two measures, capital support is also important for first of a kind projects. We see the role of the UK Infrastructure Bank as extremely important for developing a domestic SAF industry, through measures such as loan guarantees or other instruments.

## List of member companies

2G BioPOWER  
360 Environmental  
AB Sugar  
ACT Fuels B.V.  
Advanced Biofuel Solutions Ltd  
Air Liquide Advanced Business & Technologies UK Ltd  
Alfanar Energy Limited  
Alcogroup SA  
Argent Energy (UK) Limited  
Big Atom  
Broadmanor Consulting Limited  
Calor Gas Limited  
Clean Emissions  
CNG Fuels Ltd  
Decarbonise Fuel Limited  
Ensus UK Ltd  
European Tyre Recycling / Fluidice  
Flogas  
Fulcrum BioEnergy Limited  
Gasrec Limited  
Greenenergy International Limited  
In Perpetuum Partners LLP  
IRR Waste2Energy  
Joulevert Limited  
Lanzatech UK Ltd  
Mint Green Sustainability Ltd  
NFU  
NNFCC  
Nova Pangaea Technologies (UK) Limited  
Olleco  
Phillips 66 Ltd.  
Velocys Plc  
Warrens Emerald Biogas Ltd  
Wastefront AS  
WTEnergy Ltd  
Zemo Partnership