

Response to RTFO Account Holder Communication no. 9 - feedback on updated guidance

1. Page 24. The heading for section 4.7 says "renewable" but includes RCFs. Could / should this be altered to say "low carbon" or similar?
2. Section 4.31 (p27): This section discusses the requirement for substantial carbon capture when producing hydrogen. It infers by the wording that this is only required when the hydrogen is made via reforming of methane, or from methane. It would be helpful to clarify this by saying if it does / does not apply to other routes - e.g., gasification or pyrolysis, and/or where methane is not part of the pathway.
3. Section 8.35 (p78): There is a minor typo with an extra "be" in the text that could be removed
4. Section 8.60 (p84): This section discusses carbon capture and storage. Given the interest in this area, have the DfT considered setting out how to apply to the DfT for recognition of particular CCS routes? For example, biochar from pyrolysis often gets mentioned, but it is not included here. If someone had a route to producing biochar, (and there are multiple different ones, when considering feedstocks or end use of the biochar), how should they go about getting DfT's approval of it? What information ought they to send in?
5. Section 9.20 (p94): In this section regarding use of voluntary schemes, it could stress that a PoS is not definitive proof of the consignment being sustainable. Sections 11.5 (p115) onward go into more detail but still don't quite go as far as to spell out that the Administrator *may* ask for additional info over and above that which is on the PoS. I think this would be helpful for suppliers, as a point of reference.
6. Section 11.19 (p117): This refers to the separate [RCF guidance](#), so is a comment on that as well as the updated Compliance Guidance. The Compliance Guidance indicates that the carbon intensity of the RCF is set when the feedstock is assessed for eligibility. However, the RCF guidance is not explicit about this. How would this process be managed where due to production differences the carbon intensity of the RCF varied across a year or between different (but similar) plants?
7. Annex L (p182): The entry for RCFs defines them as "renewable" - which they are not. Or does it mean they are a type of fuel that is eligible in the *Renewable Transport Fuel Obligation* - therefore they are a "renewable fuel type" in that context?