

CONSULTATION RESPONSE FORM

PUBLIC CONSULTATION ON CARBON AND SUSTAINABILITY REPORTING UNDER THE RENEWABLE TRANSPORT FUEL OBLIGATION (RTFO)

PART 1 - Information about you

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Company Name or Organisation (if applicable)	Energy North East (www.energynortheast.net)
Please tick one box from the list below that best describes you /your company or organisation.	
<input type="checkbox"/>	Small to Medium Enterprise (up to 50 employees)
<input type="checkbox"/>	Large Company
<input type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input type="checkbox"/>	Interest Group
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Police
<input type="checkbox"/>	Member of the public
<input checked="" type="checkbox"/>	Other (please describe): Regional Partnership
<p>If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members:</p> <p>Energy North East is not a membership body but is a representative body for the energy community in North East England. The partnership through its active representation from the public sector, the business community and the affordable warmth sector is able to advocate on behalf of the regions energy community and promote the regions energy capabilities. The views expressed have been obtained through discussions with members of the partnership. The opinions expressed in this response are a collective view of the partnership and do not represent the views of the individual members of the partnership.</p>	

If you would like your response or personal details to be treated **confidentially** please explain why:

PART 2 - Your Comments

1. Is the general scope of the reporting requirement set out in chapter 2 appropriate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If your answer is no please explain your reasons and add any additional comments you wish to make:		

2. Is the meta standard approach suggested in chapter 3 appropriate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If your answer is no please explain your reasons and add any additional comments you wish to make:		

3. Are the Environmental and Social principles set out in chapter 3 the right ones?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If your answer is no please explain your reasons and add any additional comments you wish to make:		

4. Do the proposals for the content of monthly reports set out in chapter 3 provide enough detail - is there other information we should require?	Yes x	No <input type="checkbox"/>
<p>Please explain your answer:</p> <p>The consultation document states that it calculates all significant sources of CHG emissions from “<i>well-to-wheel</i>” however a closer study of the framework indicates that only the carbon intensity for the biofuel crop is considered rather than the carbon profile from the whole supply chain that incorporates the transportation and refining costs.</p> <p>Figure 1 on page 40 of the consultation report identifies the stages of the supply chain and the need for each party to keep ‘Chain of Custody’ records for the feed stock. In moving through the supply chain the carbon profile of the feed stock will</p>		

increase due to both the transportation between the parties as well as the activities at each process plant, but the framework does not propose to capture this. On page 7 of the Carbon Reporting methodology there is brief reference to the fact that there are several sources of GHG emissions in the supply chain which only make a small contribution to the carbon intensity of a fuel chain, indicating that there is marginal benefit in including a number of them in the calculation. It goes on to identify three sources that should be excluded, namely:

- *“Emissions associated with the manufacture or maintenance of machinery or equipment used in the biofuel fuel chain.*
- *Emissions of three GHGs included in the Kyoto Protocol –perfluorocarbons, hydrofluorocarbons and sulphur hexafluoride – that are of little relevance to biofuel fuel chains. The only potential source of these GHGs is air conditioning in vehicles (e.g. tractors used in crop production) and is likely to be very small.*
- *Emissions associated with the production of chemicals used in conversion plants that would contribute less than 1 percent of total fuel chain emissions.”*

The carbon dioxide emissions associated with transportation and processing do not fall into any of these categories and as such should become part of the carbon profile for the feed stock to biofuel process. As an example to illustrate this point under the proposed methodology a feedstock that has been sourced from say Malaysia, transported to say Milford Haven to be refined and then is sold on the garage forecourts of North East England, would have the similar CHG profile as a feedstock grown in North East England, refined on Teesside and then sold on a garage forecourt in North East England, because the true carbon costs have not been factored in. Clearly this is an incongruous situation and the carbon reporting should reflect the full impact of the “well-to-wheel” supply chain through including the full environmental costs of transportation and processing.

At no point does the consultation document address the impact of the efficiencies of the processes involved in converting a feed stock to a biofuel and providing incentives to optimise the productivity of the refining process. Indeed a key message from the 2007 Energy White Paper is the importance of maximising the energy gain through process improvements. The methodology should find a mechanism to reward greater energy yields from the feedstock ensuring that the whole crop is used such that the overall carbon footprint is as low as possible and that waste is minimised.

5. Is there other information that should be required in the annual reporting requirements set out in chapter 4?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If yes, please give details		

6. Are the targets for reporting in chapter 4 appropriate - should they be higher / lower?	Right <input type="checkbox"/>	Higher <input type="checkbox"/>	Lower <input type="checkbox"/>
Please explain your answer:			

7. Is our approach to the chain of custody set out in chapter 5 a sensible one?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If your answer is no please explain your reasons and add any additional comments you wish to make:		

8. Are we right not to allow C & S information to be transferred in an equivalence trade - chapter 5?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If your answer is no please explain your reasons and add any additional comments you wish to make:		

9. Is our approach to verification set out in chapter 6 appropriate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If your answer is no please explain your reasons and add any additional comments you wish to make:		

10. Are there any other standards that should be benchmarked from the outset - Annex A?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If yes, please explain which ones		

11. Is excluding by product reporting as suggested in Annex A appropriate? - Are the by-products suggested in Annex A the right ones?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If your answer is no please explain your reasons and add any additional comments you wish to make:		

12. Is the exemption for mechanised farming suggested in Annex A appropriate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If your answer is no please explain your reasons and add any additional comments you wish to make:		

13. Are the carbon intensity default values set out in Annex F correct?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If your answer is no please explain your reasons and add any additional comments you wish to make:		

14. Is the approach to assessing the impact of land use change set out in Annex G appropriate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If your answer is no please explain your reasons and add any additional comments you wish to make:		

15. Are the costs of complying with the guidance as set out in the Partial Regulatory Impact Assessment for the draft Renewable Transport Fuel Obligations Order 2007 broadly correct?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If your answer is no please explain your reasons and add any additional comments you wish to make:		

If you have any other general comment that you would like to make concerning this consultation, please give them here:
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Please send this response to:

rtfo.consultation@dft.gsi.gov.uk

For further information contact Rupert Furness on 0207 944 4899 or
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