




RFA C&S Consultation: **responses, new TG, Verifiers' Guidance,** **RFA work programme**

RFA Biofuel suppliers & traders meeting, London

21 April 2009

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Headlines

- **24 responses**
 - **General support for proposed C&S TG changes**
 - **Harmonisation with RED general theme**
 - **Revised TG issued Monday 16th March**
 - **Summary of responses also published**
- 

Revised default values

1. More conservative fuel defaults

- Widespread support

2. Unknown country defaults

- General support for requiring more information

BUT

- some support 1% threshold here too;
- support for an 'EU' region;
- some want more conservative assumptions across the board (LUC etc.)
- tallow defaults should take into account latest evidence



New Technical Guidance

- ✓ Fuel level defaults (unknown feedstock & country) set at the fuel chain with the highest CI
- ✓ 1% threshold for feedstock defaults (unknown country);
- ✓ Default will rise if 'unknowns' > 1%
- ✓ Tallow default remains unchanged
 - ✓ inline with RED
 - ✓ RFA research programme on indirect effects of wastes

Q6. Do you agree with the results of the RFA's benchmarks of standards?

| Benchmarked standard | RTFO Environmental Meta-Standard? | RTFO Social Meta-Standard? | Qualifying Environmental Standard? | Qualifying Social Standard? | Audit quality? |
|--|-----------------------------------|----------------------------|------------------------------------|-----------------------------|--------------------------|
| Operational standards | | | | | |
| Genesis Quality Assurance (QA) | Yes | No | Yes | No | Yes |
| GlobalGAP | No | No | No | No | Not analysed |
| Scottish Quality Crops (SQC) | No | No | No | No | Not analysed |
| FEDIOL | No | No | No | No | No |
| German Qualität und Sicherheit (QS) | No | No | No | No | Yes |
| Standards under development | | | | | |
| Round Table on Responsible Soy (RTRS) | No | No | Yes | Yes | Not yet developed |

Q6 - responses

- **Concern about lack of standards & related targets;**
- **TG should more clearly distinguish between standards and certification schemes;**
- **Some strong criticism of benchmarking – Over-reliance on EIA regulations around meeting biodiversity and carbon conservation.**



Q8. Do you agree with the current approach to the specified standards under development?

1. RFA announces on its website when a sustainability scheme (for which the temporary solution has been allowed) has become operational.
2. From that time companies should endeavour to source feedstock certified by the now operational standard. Any new audits of farms/plantations should be carried out as a part of the standard according to the standard's procedures.
3. Successful independent audits against the standard criteria carried out *before the sustainability scheme went live* can be reported under the RTFO according to the temporary solution for a further 15 months.

N.B. Still possible to audit to the RTFO Meta Standard



Q8. Responses

- Need up to a year after feedstock standards available for temp solution to avoid bottlenecks. Suggestion that should relate to an amount of material becoming available; need a longer transition phase
- RFA must confirm the auditing requirements for standards under development – should be the proposed norm for certification and audit standards.
- RTRS not an operational standard – should not accept. Basel criteria an operational standard, but not a certification scheme.
- Strong criticism of RSPO - not assisting forest protection



Q9. Do you agree.. the RFA [should] focus only on third party verification schemes?

- Main focus has been on certification schemes;
- Other schemes out there – IFC, Defra environmental stewardship scheme;
- Experience this year highlighted challenges in assessing and using such schemes for a purpose they weren't intended for.



Q9. responses

- **Concern that this would exclude audit to RTFO Meta-standard and standards under development [it wouldn't]**



Q10. Do you agree with the suggested procedure for new benchmarks?

5 stage process outlined:

- 1. Request;**
- 2. Benchmarking;**
- 3. Informing;**
- 4. Consultation;**
- 5. Approval.**



Q10 - responses

General agreement to process, but concerns about the details:

- Expert panel – who, how, when?
- More clarity on process and timings
- Benchmarking needs to cover chain of custody requirements
- Application to meta-standard acceptance (same benchmarking applies)?
- De-selection – need similar time period if no longer acceptable and need to spell out (e.g. 15 months).

Q12. Do you agree with the proposed norm for audit quality criteria & the associated level of conformance?

7 Principles to benchmark certification schemes

| Criterion | Norm | Conformance |
|--------------------------------------|---|-------------|
| 1. Accreditation of CBs | ISO Guide 65: 1996, ISO 17021: 2006, or justified equivalents. | MAJOR MUST |
| 2. Management of the audit programme | ISO 19011: 2002, or justified equivalent. | MINOR MUST |
| 3. Audit frequency | Once every 5 years for a full certification audit and once a year for a surveillance audit. | MAJOR MUST |
| 4. Auditor competency | ISO 19011: 2002, or justified equivalent. | MAJOR MUST |

Q12 responses

Lots of detailed comments:

- Implications of standards that don't meet major musts for each obligation period must be made clear;
- Public summaries should not be a 'minor must';
- Consultation should be a 'major must';
- 'Minor musts' should have time-table attached to becoming 'major musts';
- Crops should be specified for each standard;
- Audit should cover control of the supply chain (chain of custody) to certificate issue.

Part 2: Verifiers' Guidance

Document for verifiers covering:

1. Criteria;
2. Testing procedures;
3. Evidence;
4. Assurance statements;
5. Auditor requirements



Part 2: responses

Widespread support, but:

- Guidance issued too late
- Lots of very detailed comments:
- Should not be presumption that verifiers need to obtain evidence from down the supply chain;
- Workshop later in the year post 08/09 verification to review experience, re-issue revised guidance.



Verifiers' Guidelines

- RFA workshop held in early April
- Revised version (minor amendments) currently with Verifiers for consideration
- Will be issued shortly
- Have also made available for Working Group 5 of TC383 – CEN



Part 3: Approach to indirect effects

- Methodology & case studies to consider indirect effects of using wastes and by-products as biofuel feedstocks;
- Use to inform EU methodology;
- No change to defaults in the meanwhile (tallow);
- Develop a work programme for indirect land use change with stakeholders



Part 3: responses

- General agreement to informing EU methodology but not universal (not for the RFA?);
- General agreement that wastes & by-products can cause indirect effects, But:
 - lack of information (elasticities);
 - indirect modelling deeply flawed (static models);
 - questionable priority for some;
 - questionable practicability of applying in practice;
 - temporal aspects problematic (rolling average?).
- Split on whether to change tallow CI defaults



Next steps

- Final *Guidance for Verifiers* will be issued by end April 2009
- The draft version is currently available online
- Suppliers should ensure they are using the correct version of the C&S TG – V1 for 2008/2009, v2 for 2009/2010
- First reporting deadline for use of v2 is 15 June 2009 for fuel supplied across the duty point 15 April-30 April 2009
- Tendering for work on wastes & by-products; Project for further work to avoid ILUC following shortly;
- Next year's guidelines to move toward RED



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Issue No. 4 November 2008

Biofuels in Brazil

This week RFA Chief Executive Nick Goodall has been in Sao Paulo as a special guest of the Brazilian Government's *Biofuels 2008* conference. Nick participated as a discussor in the 18th plenary session, looking at trade rules, technical issues and sustainability standards.

He emphasized that achieving the best possible carbon savings should be the core objective for biofuels policy, and that the world trade framework must support rather than hinder this goal. He also spoke about our experience of implementing the world leading carbon and sustainability reporting mechanism that underlies the RTFO, which has

helped demonstrate both the potential and the challenges for sustainable biofuels.

Nick contributed to a number of other sessions, including the climate change plenary where he introduced the issue of indirect land use change. He was also invited to attend the high level inter-governmental sessions as an independent expert.

Fourth month's data released

The RFA's fourth monthly report has been published on the website.



See Nick, host of the International Conference on Biofuels.

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Issue No. 5 December 2008

First reporting of the RTFO meta-standard

In our 18th monthly RTFO report we were pleased to see the first biofuel meeting the RTFO social sustainability meta-standard. This gold standard for biofuels production is available to fuels that meet criteria for worker's rights and land rights in the RFA sustainability reporting guidelines.

No existing feedstock certification schemes meet the full social criteria, so the social meta-standard is only available to suppliers who independently audit their feedstock production.

We hope to see increasing quantities of fuel meeting the meta-standard in future, and companies reporting this standard will be identified in our upcoming quarterly report.

Also: First biofuel - see page 3



RFA CEO Nick Goodall celebrates November during plenary 2 in Brazil.



Andy Pig talks about 'Grease to Grease' and his latest project - see page 4.

Back from Brazil

RFA CEO Nick Goodall, Lord Hunt and a multi-departmental UK delegation, along with hundreds of representatives from other countries, attended an international biofuels conference in Brazil last month. The first three days of the conference featured plenaries with an array of international biofuels experts, followed by two days of high level inter-governmental talks.

President Lula de Silva and the Government of Brazil want to improve market access in Europe for Brazilian ethanol, which they claim can be produced without impacting food prices.

However, experts including Nick reminded the conference that mechanisms are needed to address the indirect impacts of biofuels.

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Thank you

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