

bp plc response to HMG consultation on supporting recycled carbon fuels through the Renewable Transport Fuel Obligation

Key Points

- bp agrees with a principles-based approach to determining recycled carbon fuel (RCF) feedstock eligibility.
- In bp's view, neither option for removing the minimum biogenic content would ensure that potentially recyclable plastics and/or plastics suitable for chemicals would not be used for RCFs. A technology-based approach to eligibility assessment could help tackle this.
- bp agree that the reporting and verification requirements for RCFs should be aligned with renewable fuels currently supported under the Renewable Transport Fuel Obligation (RTFO), enhancing fair and open competition.
- While UK produced RCFs would naturally comply with the sustainable waste management criteria, producers from other countries should also be required to comply with the same minimum criteria. This would further ensure fair and open competition for RCFs that are produced both within and outside the UK.
- Qualifying RCFs should demonstrably lower UK transport greenhouse gas (GHG) emissions, with the level of reward broadly proportionate to GHG emissions saved and the economics of making supply available.