An Roinn Iompair
Department of Transport

Public Consultation – Considerations for a Revised Renewable Transport Fuel Policy 2025-2027

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Consultation
December 2024

Introduction

This consultation concerns the next iteration of the Renewable Transport Fuel Policy 2025-2027 involving the transition to renewable energy in transport and setting out a policy pathway for delivery of the 2030 transport targets set out in the Climate Action Plan as agreed by Government as well as the targets and requirements under the European Renewable Energy Directive.

Consultation Requirements

The Minister for Transport, Eamon Ryan TD, invites your views as to the priorities, choices, opportunities, and challenges set out in this consultation.

- ✓ **Submissions should be structured according to the questions set out in this document, responding to one or more of the questions as appropriate.**
- ✓ **Views from stakeholders and interested parties are requested no later than 17 January 2025.**
- ✓ **Submissions may be made via online form or email.**
- ✓ **Submissions made via email should be marked 'Renewable Transport Fuel Policy Consultation' and emailed to rtfp@transport.gov.ie**

The Department may make public on its website all submissions, or a summary of submission responses, received under this consultation.

Respondents are advised that the Department is subject to the Freedom of Information Act 2014 and the European Communities (Access to Information on the Environment) Regulations 2007-2014 and data protection legislation.

Personal, confidential, or commercially sensitive information should not be included in your response, and it will be presumed that all information contained therein is releasable under the Freedom of Information Act 2014.

Policy Context for the Renewable Transport Fuel Policy 2025-2027

Ireland has committed to transitioning to a low carbon society and economy as part of the wider European goal of achieving climate neutrality by 2050, and the Climate Action Plan 2024 sets out a suite of measures to achieve transport's contribution to legally binding carbon budgets. Renewable transport fuel will have a transitionary role while electrification of transport is being rolled out and public transport and active travel measures are put in place.

National climate targets

The transition to renewable energy in the transport sector in Ireland is a significant contributor to the National Energy and Climate Plan. Achievement of the 2030 EU targets is required as part of the challenge for a 90% net greenhouse gas emissions reduction by 2040 compared to 1990 levels, which is in line with recent scientific advice and the European Union commitment under the Paris Agreement. The biofuel blending trajectory set in the Government's Climate Action Plan (i.e. E10 in petrol and B20 in diesel by 2030) is expected to deliver over 1.08 Mt in emissions abatement by 2030, representing over 18% of the decarbonisation pathway for transport.

The Renewable Transport Fuel (RTF) Policy has already made a significant contribution to mitigating transport emissions for land transport in Ireland to date. The EPA Emissions Inventory Report 2024[1] notes that the RTFO is one of the primary reasons for the 18.3% decrease in transport emissions between 2007 (the year of establishment of Ireland's national inventory system) and 2022.

The RTF Policy 2025-2027 will extend into the timeframe of the second carbon budget (2026-2030) established under the Climate and Low Carbon Development Act 2021. The Climate Action Plan includes an action for future work to identify additional measures addressing unallocated savings related to the second carbon budget. This will involve a policy assessment concerning delivery of an increased biofuel (B30 by 2030) target in road and rail transport

[1] Environmental Protection Agency, 2024, 'Ireland's National Inventory Report 2024'. Link: https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/Ireland's-NIR-2024_cov.pdf

diesel supply and consideration of the feasibility of extending the biofuel blending obligation on fuel suppliers into gas oil for transport use in non-road mobile machinery.

EU Renewable Energy Directive

The EU Renewable Energy Directive establishes common rules and targets for the development renewable energy across all sectors of the EU economy. The 2023 update of the Directive (RED III) delivers on the EU Fit for 55 Green Deal and REPower EU with higher targets for renewable energy share in transport (RES-T), doubling the target from 14% in the previous iteration of the Directive to 29% RES-T by 2030.

In opting to maintain this renewable energy share in transport target rather than moving to a GHG reduction target (of 14.5% by 2030 also set out in the Directive), the EU renewable energy targets are consistently applied across all the relevant sectors, i.e. including– transport, heating, and power generation. This also aligns with the approach taken in the National Energy and Climate Plan. This will be monitored by the National Oil Reserves Agency (NORA) throughout the next RTF Policy period and may be subject to a future review.

Ireland's RTF Policy is to keep the amount of crop-based biofuel below 2% RES-T. The low amount of crop-based biofuel supply in Ireland means that the effective 2030 RES-T target can be reduced under the provisions of the Directive to a 24% by 2030 RES-T target for Ireland. thereby making this target somewhat more achievable compared to other EU countries which have a higher percentage share of crop-based biofuel supply, while helping to ensure that Ireland's biofuel supply does not contribute to land use change.

The Directive also allows for renewable electricity through public charge points to receive credit within an obligation established by Member States to meet this RES-T 2030 target, and requires a combined target share of 5.5% by 2030 of advanced biofuel (produced from advanced feedstocks listed in the Directive) and renewable fuels of non-biological origin (such as green hydrogen, and synthetic efuels), which will be 1% of this share by 2030.

Transposition of RED III relating to the transport sector, required by 21 May 2025, will be done through legislative amendment to the Renewable Transport Fuel Obligation, under Part 5A of the National Oil Reserves Agency Act 2007. Work is underway by the Department to transpose the Directive provisions. A written consultation among stakeholders was conducted in early 2024, informing the legislative approach.

Energy and Environmental Policy

The RTF Policy also aligns with related sectoral energy and environmental policy. The planned increase of bioenergy in transport fossil fuel consumption incentivised through the RTF Policy

aligns with plans within the Bioeconomy Action Plan and National Biomethane Strategy. The Biodiversity Action Plan also tracks the impact of the Policy against indirect land use change. Additionally, the National Hydrogen Strategy notes the targets for renewable fuel of non-biological origin as potentially contributing to future consumption demand in transport for green hydrogen by 2030 and thereafter as a potential feedstock in the production of synthetic efuels.

The United Nations 2030 Agenda for Sustainable Development sets out 17 Sustainable Development Goals (SDGs), which are an urgent call for action by all countries in a global partnership to end poverty, protect the planet and improve the lives and prospects of the global community. Sustainable transport is mainstreamed across several SDGs and targets, including economic growth and food security. The transport sector will also play an important role in the achievement of the Paris Agreement, a legally binding international treaty on climate change. The Renewable Transport Fuel Policy is an essential part of Ireland's action on the SDGs and climate targets, setting out a framework to increase the supply of renewable, sustainable fuel to the Irish transport sector.

Questions
1. From your perspective, where should the policy priority focus be over the next two years concerning the implementation of the EU and national targets for renewable fuel in transport? 2. In your view how can the principles for bioeconomy and biodiversity be more effectively applied through the next iteration of the Renewable Transport Fuel Policy? 3. Are there specific considerations regarding renewable gas in transport that you would like to see reflected in the Renewable Transport Fuel Policy? 4. Would you like to see a review of the target for renewable energy in transport in the next two years, including the possibility of a GHG reduction target rather than a renewable energy share target?

RTFP Working Groups and Industry Expert Panel

In 2023 the Department of Transport established working groups to support the implementation of Renewable Transport Fuel Policy actions on biofuel sustainability and meeting European targets for renewable energy share in transport. This was an action under the Renewable Transport Fuel Policy Statement 2023-2025.

These are State level working groups with membership drawn from the relevant Government Departments and Agencies responsible for renewable energy, sustainability, and related policy areas. The Industry Expert Panel incorporates biofuel and biogas producers and suppliers, obligated parties and account holders under the RTFO, and the representative bodies for these economic operators.

The Biofuel Sustainability Working Group was established in response to a recommendation in the Biofuel Study 2022 and is progressing a high-level vulnerability assessment concerning the scope for fraud risk within the current and projected future biofuel supply in Ireland. It will also make recommendations on where improvements can be made.

The Renewable Energy Share in Transport (RES-T) Working Group is steering research into the projected demand and available supply of sustainable advanced biofuel and renewable fuels of non-biological origin, in the context of revised minimum EU renewable energy targets for 2030.

The work of these groups is supported by the Industry Expert Panel, which provides a mechanism for understanding the impacts of issues and measures on indigenous industry and to ensure continuous engagement with stakeholders as the Department develops and implements policy.

The work of these groups is helping to inform policy development. The output of the working groups will be included in a report to the Minister at the end of 2024. Stakeholder views are sought on the continued rationale and role of these working groups in support of policy development and implementation, as well as views on the priority areas of focus for the work programme of the working groups.

	Question
	1. Should the Working Group approach be continued as a means of ongoing policy implementation, and if so, what should be the priority focus or topics for further consideration? 2. Do you think that the mechanism for consultation with industry on renewable transport fuel to date has been sufficient or could it be improved or achieved in other better ways?

Biofuel Sustainability

Member States' fuel suppliers, producers, and transport operators rely upon the assurance of the European oversight regime for sustainable biofuels as set out in the Renewable Energy Directive. This involves European Voluntary Scheme certification and proof of sustainability for all biofuel supply, oversight by national competent authorities and, in the near future, a Union database of biofuels to trace sustainability from the point of origin of the feedstocks used in the production of these biofuels to the final consumption in the marketplace.

Responding to the EU-level requirement to limit and phase out biofuels made from palm oil to eliminate the associated land use change environmental impacts, Ireland's legislation will continue to limit and reduce this type of supply to 0% by 2030. However, related feedstocks and waste from palm oil production, such as palm oil mill effluent (POME), are considered under the EU Directive to be appropriate feedstock for advanced biofuels and are incentivised under the EU requirements and in the RTF Policy. Increase in supply of this type of biofuel across the EU and in Ireland has raised concerns, which are being addressed at an EU level.

Furthermore, if biofuel imports are not required to meet the same strict sustainability criteria in the EU Renewable Energy Directive, this could disadvantage EU biofuel producers and negatively impact the further development of advanced biofuel production within the EU, which is an objective of the Directive. A recent investigation by the European Commission into dumping of biodiesel and HVO imports from China has resulted in provisional tariffs on such imports being imposed, subject to a final decision in February 2025.

There are indications in the market of a growing distribution for use of 100% HVO, particularly in harder-to-abate sectors which is significantly above the national target (B20 by 2030). Additionally, it is noted that the EU Clean Vehicle Directive considers an ICE vehicle operated on 100% HVO to be zero emission for the purpose of meeting targets for green public procurement.

	Question
1.	Given the incentivised demand and sustainability risks associated with certain biofuel and feedstocks, and the mitigation in place and planned, do you support: a. continuation of the current RTF policy to increase the scope and level of national targets for biofuel supply. b. continuation of the incentives to fuel suppliers, through additional credit for supply, of biodiesel and HVO, and in sectors such as aviation and maritime. c. further mitigation measures such as a national ban on certain types of biofuel or feedstocks.

d. further mitigation measures concerning legal or administrative provisions for supervision of sustainability of biofuel.

Renewable Transport Fuel Obligation

The Renewable Transport Fuel Policy is the pathway to incentivise supply of renewable fuel in transport through annual increases in the Renewable Transport Fuel Obligation (RTFO) rate to 2030, as well as ensuring EU sustainability and greenhouse gas emissions reduction criteria are adhered to. The Policy provides certainty for economic operators and stakeholders in their planning and delivery of the emission reduction targets within the transport sector.

The Policy is implemented through the RTFO, provided for under Part 5A of the National Oil Reserves Agency Act 2007, which places a statutory obligation on suppliers of road transport (fossil) fuels to ensure that a proportion of the fuels they place on the market in Ireland is produced from renewable sources. Renewable transport fuel used in transport which fulfils EU criteria for sustainability and GHG reduction is eligible for RTFO certificates and can be counted against the obligation. The obligation is administered by the National Oil Reserves Agency (NORA), which grants RTFO certificates to the obligated parties for renewable transport fuel supplied to the market.

The Renewable Transport Fuel Policy sets out a progressive increase in the RTFO rate to meet Climate Action Plan targets. Obligated parties have a variety of renewable fuel pathways to meet the national mandate, e.g., ethanol in petrol, biodiesel or HVO in diesel, biomethane, etc., incentivising a competitive market to deliver increased renewables in transport.

The RTFO rate of renewable transport fuel as a proportion of road transport fossil fuel supply is currently 21% (by energy). Renewable transport fuel which fulfils EU criteria for sustainability and greenhouse gas (GHG) reduction is eligible for RTFO certificates and can be counted against the obligation.

RTF Obligation to Target - Indicative Trajectory of Annual Increase in Rates 2026-2030

The current policy 2023-2025 as agreed by Government establishes the obligation rates up to and including 2025. The Renewable Transport Fuel Policy 2025-2027 must align with the revised EU targets for renewable energy in the transport sector as well as achieving a physical 10% ethanol in petrol and 20% biodiesel/HVO in diesel by 2030.

An indicative increase in the renewable transport fuel obligation rate to achieve this over the period 2026-2030 is set out in the following table:

Indicative RTFO 2026-2030:

	2025	2026	2027	2028	2029	2030
RTFO 2023-2025	*25%*	*29%*	*34%*	*39%*	*44%*	*49%*
Pathway 1: RTFO 2025-2027 *with current Annex IX double counting and current additional RTFO certificates, with renewable electricity (minimum single counting)*		31%	35%	39%	44%	54%
Pathway 2: RTFO 2025-2027 *with multiple counting as per RED III (including renewable electricity multiple counting)*		28%	31%	35%	40%	50%

Source: The National Oil Reserves Agency *(These are indicative figures for illustrative purposes only)*

These indicative trajectory pathways are high enough to protect the supply of physical biofuel to meet the CAP E10:B20 by 2030 target, as well as meeting the EU RES-T requirements and limits, as well as flexibility for obligated parties to meet 15% of the obligation through certificates awarded in previous periods.

The indicative trajectory in the table above assumes the share of renewable electricity in transport to 2030 will correspond to the achievement of EV targets and supply of additional renewable electricity as set out in the Climate Action Plan. In adhering to the 1.7% limit on counting Annex IX Part B biofuel supply under the EU RED, the indicative trajectories also assume that advanced biofuel and RFNBO supply (as set out in the following section) will meet and exceed the EU requirement for renewable energy share in transport.

The trajectories are set out in two pathways, for illustrative purposes, as follows:

i. Pathway 1 includes the current provision for award of RTFO certificates - double certificates for Annex IX and additional certificates for RTF as specified by regulation, as well as a minimum single counted certificates for supply of renewable electricity at public charge points.
ii. Pathway 2 includes double certificates for Annex IX and additional certificates for RFNBO and Renewable Electricity, and renewable fuels supplied to aviation and marine, as set out in RED III, acknowledging the need for signalling incentives to support development of supply pathways for this type of renewable energy in transport.

These two pathways are continued through the following sections on sub-target obligations for advanced biofuel supply and renewable fuel of non-biological origin (RFNBO) supply in the following sections.

Obligation for Advanced Biofuel and Renewable Fuel of Non-Biological Origin (RFNBO)

Due to the prominent levels of biodiesel/HVO supplied and incentivised through the Climate Action Plan, achievement of CAP targets will require much higher levels of advanced biofuel and/or RFNBO supply than prescribed in the EU Directive as minimum RES-T targets. An indicative increase in the separate or combined advanced biofuel and RFNBO obligation rate to achieve this over the period 2026-2030 is set out in the following table:

Indicative ABO & RFNBO 2026-2030:

Option 1 – Separate AB & RFNBO obligations

	2025	2026	2027	2028	2029	2030
ABO 2023-2025	*1.5%*	*2.4%*	*3.4%*	*4.7%*	*6.2%*	*7.9%*
Pathway 1: ABO 2025-2027 *with current Annex IX double counting and additional certificates*		10%	12%	14.5%	17%	19%
Pathway 2: ABO 2025-2027 *with Annex IX double counting*		8%	10%	12%	14%	16%

Source: The National Oil Reserves Agency *(These are indicative figures for illustrative purposes only)*

New RFNBO-O 2025-2027	2025	2026	2027	2028	2029	2030
Pathway 1: RFNBO-O 2025-2027 *with current additional certificates*		0.6%	1.2%	1.8%	2.4%	3%*
Pathway 2: RFNBO-O 2025-2027 *with multiple counting as per RED III*		0.4%	0.8%	1.2%	1.6%	2%*

Source: The National Oil Reserves Agency *(These are indicative figures for illustrative purposes only)*

*this % is equivalent to 1% as specified in Article 25.1 of the EU RED

Option 2 – Combined AB & RFNBO obligation

Combined AB & RFNBO Obligation 2025-2027	2025	2026	2027	2028	2029	2030**
Pathway 1: Combined AB & RFNBO Obligation 2025-2027 *with current Annex IX double counting and additional certificates*		11%	13%	16%	19%	
Pathway 2: Combined AB & RFNBO Obligation 2025-2027 *with multiple counting as per RED III*		8%	11%	13%	16%	

Source: The National Oil Reserves Agency *(These are indicative figures for illustrative purposes only)*

**In 2030 at the latest it is required to revert to separate sub-target obligations as in Option 1.

For all scenarios presented in the tables above, the achievement of the RES-T through the indicative trajectory assumes the share of renewable electricity in transport to 2030 will correspond to the achievement of EV targets and supply of additional renewable electricity as set out in the Climate Action Plan. The flexibility for obligated parties to meet 15% of the obligation through certificates awarded in previous periods is also built into these indicative trajectories.

Preliminary analysis conducted by the NORA for the RTP RES-T Working Group suggests low to no availability of RFNBO out to 2030 and constraints on the ability to consume it in transport. This would mean that setting a RFNBO obligation with a corresponding buy-out for an obligation not disposed of through supply would be an additional cost of operation for suppliers with no decarbonisation benefit. Regarding advanced biofuels, there are recent indications of an increase in availability of certain types of advanced biofuel, with the current advanced biofuel obligation (ABO) rate being exceeded. However, there are also questions concerning sustainability, particularly regarding imported biofuels on an EU-wide basis which have yet to be assured.

Considering the evidence of low to no RFNBO supply availability or transport use in the short-term, the Option 2 of a combined AB & RFNBO obligation is included in the indicative trajectory table above, allowing some flexibility for suppliers in the near-term. Under a combined AB & RFNBO obligation, effectively RTF certificates issued for advanced biofuel and for RFNBO, could be interchangeable for the purpose of meeting the combined obligation target.

The level of buy-out charge was amended during the RTF Policy 2023-2025, providing for a €0.05 /MJ buy-out for the RTFO [originally set at €0.45 per litre in 2010], and €0.08 /MJ buy-out for the ABO. A separate sub-target for RFNBO would require establishing a dedicated buy-out price for the RFNBO obligation yet to be determined. However, a combined AB and RFNBO obligation under Option 2 could have one buy-out charge initially set at the current ABO buy-out and reviewed over the RTF Policy 2025-2027.

Where there is evidence of a lack of available supply of these advanced biofuels and RFNBO, it could also support an application to the European Commission by a Member State to increase the EU RES-T 1.7% limit on the supply of biofuels such as biodiesel and HVO made from feedstocks on Annex IX Part B UCO and Tallow. (Under the Directive it is also open to the Commission to review and increase this 1.7% limit on Part B type biofuels on an EU-wide basis.)

The Biofuel Study 2022 indicates strong indigenous and global availability of sustainable supply of these (Part B) type biofuels to meet CAP biofuel B20 by 2030 target. Ongoing research being conducted under the RES-T Working Group is expected to provide evidence regarding estimated availability of sustainable advanced biofuel and RFNBO to support

Ireland's future demand for these fuels in meeting both EU RED and CAP biofuel targets. This will inform both the proposed trajectory for the ABO and RFNBO-O to 2030 for Ireland and whether an application to increase the 1.7% Part B limit for Ireland is warranted.

	Questions
	1. Do you agree with Ireland's strategy for meeting both the Climate Action Plan and renewable transport fuel 2030 targets, by increasing advanced biofuel and RFNBO targets, rather than making an application to the Commission to increase the limit on Annex IX Part B biofuels, or should both pathways be pursued simultaneously to 2030? Please state your reasons for agreeing or disagreeing. 2. What do you see as the key beneficial or challenging impacts of the different pathways approach to the incremental increase in the RTFO in delivering on the 2030 targets? In your view how should the Policy address these impacts? 3. Considering the evidence for low/no availability for transport demand concerning RFNBO in the short-term, would you consider a combined advanced biofuel and RFNBO sub-target in the short term would be as effective as two separate sub-targets?

Award of Additional Certificates

The Directive double counting of Annex IX biofuels is applied at an EU level. The incentives for double counting this type of biofuel align to the objective of developing biofuel production, investment, and supply from these sustainable feedstocks.

In Ireland, Regulations[2] were brought into play in Q1 2023 to further incentivise supply of certain RTF within the Climate Action Plan - HVO, FAME to meet the B20 by 2030 biofuel target, aligning biomethane supply with targets for increased anaerobic digestion (National Biomethane Strategy) and Green Hydrogen supply with plans for increased renewable electricity to support a future hydrogen economy (National Hydrogen Strategy).

These Regulations have achieved their purpose, with increased levels of HVO or FAME biofuel supply evidenced in the land transport sectors. Between 2021 and 2023, the physical blend rate of biodiesel increased from 6% to 8.9% responding to the increased RTFO rates. On

[2] National Oil Reserves Agency Act 2007 (Additional Certificates for Renewable Transport Fuel) Regulations 2023 (S.I. No. 143 of 2023)

average over the 2023 period, by volume, biodiesel and HVO/CHVO accounted for 83% of the total biofuel market.

The incentives in the Regulations concerning biofuel in aviation and maritime sectors have also been replaced by EU supply mandates commencing in 2025 which directly incentivise supply of these biofuels in the aviation and maritime transport sectors.

There is ongoing concern as to the sustainability of some of these incentivised biofuels supplied into the EU for transport use as set out in the previous section on sustainability. This needs to be addressed at an EU level, primarily through more robust oversight of sustainability certification and supervision of certification bodies under the system of EU-approved Voluntary Schemes under the Directive. Continuing the additional certificates incentive in this context may carry further risk of incentivising unsustainable supply.

The Biofuel Study 2022 examined indigenous biofuel production capacity, noting a capacity in 2020 of 57.2kt (apx. 64m^2). The Biofuel Study outlines planned developments which, if realised, could increase Ireland's biodiesel/HVO production capacity to between 550m and 850m litres, depending on market and regulatory conditions. According to Eurostat data, Irish production of biodiesel rose to 162.8kt in 2022[3]. However, it is acknowledged in the Study that the dependency on imported feedstocks for production of biofuels will remain.

Concerning biomethane, the plans by Government to introduce a renewable heating obligation to incentivise renewable gas into the heating sector are supported by analysis (SEAI Heating Study 2022) suggesting a priority use of biomethane in heating rather than transport. There is also a physical limitation on the amount of biogas that can be accounted for under transport use depending on the number of gas powered (CNG) vehicles in operation.

On the other hand, the continued award of additional certificates for RFNBO supply could provide a signal for future production and supply of green hydrogen and synthetic efuels, to support compliance with the Directive RFNBO sub-target of 1% by 2030. In the absence of current supply such an approach would also signal intent concerning the supply for use of these RTFBOs in the aviation and maritime transport sectors to meet future EU targets as set out in the Regulations.

Article 25(4) of the Directive promotes credit for renewable electricity supply at public charge points, which can be traded with fuel suppliers in meeting the obligation. Furthermore, the Directive does not preclude Ireland in its national legislation from allowing 100% renewable electricity to be counted, for example, if verifiable under a power purchase agreement. It is also an option for additional certificates to be awarded for renewable electricity within the

[3] Source: Liquid biofuels production capacities (table code: nrg_inf_ibpc)

Directives parameters incentivising electrification of road transport and the deployment of public EV infrastructure.

Question
1. Do you think there is a continued rationale for maintaining all or some of the current suite of additional RTFO certificates under the Regulations, as described above? 2. What changes would you like to see made to the award of additional certificates to incentivise the optimal supply of renewable fuel/energy in transport and why? And regarding the following list? a) Annex IX Part B – e.g. CHVO/HVO & FAME made from UCO or Tallow b) Annex IX Part A – e.g. CHVO/HVO made from POME, or Biomethane? c) RFNBO – Green Hydrogen, synthetic eFuels d) Annex IX biofuel in aviation (SAF) and maritime (e.g. as for a. and b. above) e) RFNBO in aviation and maritime (e.g. as for c. above) f) Renewable electricity at public charge points 3. What other considerations are relevant to the effectiveness of the additional certificates to incentivise renewable transport fuel supply under the RTFO to meet the CAP and RED III 2030 targets? 4. Considering the increase in POME-derived biofuel on the Irish and EU markets, should Ireland in the short term remove the award of additional certificates for supply of biofuel produced from this feedstock until an EU sustainability assessment has been completed? 5. As an alternative to additional certificate award for renewable electricity, would you like to see Ireland legislate for 100% where it is evidenced, for example, through a power purchase agreement? 6. RTFO certificates are awarded on a quarterly basis, and the obligation applies annually. What is your view on the lead-in time requirement for any proposed changes to the additional RTFO certificates, with due regard to the statutory consultation period (minimum 6 weeks specified), and providing ongoing regulatory certainty to impacted economic operators?

Considerations for a Move to B10

The Directive provides for an option for diesel placed on the market to contain a maximum biodiesel of 10% (B10) higher than the current B7 diesel which is standard in Ireland for use in diesel powered cars, vans, and heavy-duty vehicles.

B10 diesel offers lower emissions and reduced carbon footprint, and some European countries have changed national fuel quality law to permit the sale of B10 diesel to avail of this environmental benefit.

However, while B7 is regarded as safe for all diesel vehicles, there are some compatibility considerations with the higher B10 diesel, which could impact vehicle operation in the winter period for older vehicle models.

For the current 2030 targets, the EU Directive promotes maintenance of a B7 protection grade diesel for vehicles that were not manufactured for compatibility with a B10 grade diesel. This would require sufficient infrastructure capacity to store and distribute the two grades of diesel.

	Questions
1.	What conditions need to be in place or considered to facilitate a move to B10 in diesel and should this be considered within the next two years under the Policy?

Research to support the next phase of the policy, 2025-2027

Research has played a significant role in the development of the Policy to date. The Biofuel Study 2022 provided assurance as to the availability of sustainable biofuel and feedstocks to meet the CAP B20 by 2030 target. Similarly, the research being conducted under the RES-T WG has provided a valuable evidence base for the trajectories and options set out within this policy consultation. This research is ongoing and may lead to further phases of study, including a hierarchy of use assessment concerning certain renewable fuels, such as HVO, that are used across sectors.

There is also a commitment under CAP24 for a policy assessment concerning a proposed CAP target of B30 by 2030 and if adopted as a revised CAP target there needs to be an assessment of available sustainable biodiesel/HVO to meet this target - updating the Biofuel Study 2022.

Building upon the successful delivery of the last two-year phase of the Renewable Transport Fuel Policy, the next iteration of the policy statement covering the period 2025-2027 will require a sound evidence base for future action. This may include further policy assessment concerning extending the scope of the RTFO, to maritime transport fuels, fuels in non-road mobile machinery, and extending incentives to renewable electricity in private charging arrangements, etc.

	Questions
	1. What available or future research could support this policy? In your view, what should be the priority focus of future research? 2. What are the risks and opportunities in moving to a B30 blend?