

KING & SPALDING

AD0058 investigation on Biodiesel Imports from China

Supplement to Comments on the Product Scope

Submitted by Renewable Transport Fuel Association (“RTFA”)

OPEN VERSION

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1. Introduction

1. The present document is filed on behalf of the Renewable Transport Fuel Association (“RTFA”) in supplement of its submission of 28 July 2024 on whether Sustainable Aviation Fuel (“SAF”) should be included within the scope of the AD0058 investigation (“Comments on SAF”). This supplemental submission should thus be read alongside the RTFA’s Comments on SAF.

2. Clarification on the adaptability of SAF for use in road transport

2. RTFA clarifies its statement on paragraph 27, whereby it notes that “[a]s long as HEFA SAF remains the only commercially viable SAF available in the UK, the possibility of its diversion to road transport will persist”.
3. RTFA reiterates that the use of SAF in road vehicles is a viable option. Moreover, RTFA underlines that, in addition to HEFA SAF that is currently produced and is available in the UK, other types of SAF, including non-hydrotreated esters and fatty acids (i.e., non-HEFA types) are suitable for road transport applications.
4. Since any kind of SAF could theoretically be used in a road vehicle, there is a strong foundation for integrating non-HEFA SAF into the road transport sector as well, should it become available in the UK.

3. Clarification on the minimal investment requirements

5. Second, RTFA provides further explanation on paragraphs 38-39 of its Comments on SAF. First, RTFA emphasises that the governmental and sectoral plans mentioned therein cover both road transport via the RTFO, and air transport via the anticipated SAF mandate.
6. Moreover, the “*minimal investment requirements*” referred to in RTFA’s Comments on SAF should be understood to cover only co-processing. Minimal investments could be made to integrate HVO/SAF production equipment into existing refinery facilities in the UK for co-processing. RTFA underlines that installing standalone SAF production facilities remain among the key objectives of the UK renewable fuels industry. However, achieving this goal requires creating fairer conditions to incentivise investment into the domestic industry.
7. Thus, RTFA rectifies its statement on paragraph 41 of its Comments on SAF as follows:
 - a. “*Co-processing of HVO/SAF requires only a minimal amount of investment,*
 - b. *The biofuels industry is prepared and keen to invest in the production of new HVO/SAF production capacity in alignment with the UK Government’s efforts and the ongoing legislative processes*”.

4. Conclusion

8. RTFA trusts the above clarifications will be useful for the TRA. RTFA remains at the TRA’s disposal should it require any further information.