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# Low carbon fuels – exploring the future EU policy framework

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# Introductions



- ▶ Chris Malins
- ▶ Independent consultant at Cerulogy
- ▶ Previously:
  - ▶ Fuels Lead for the International Council on Clean Transportation 2010-2016
  - ▶ Communications Specialist for the UK Renewable Fuels Agency 2008-2010
- ▶ Member of numerous advisory groups
- ▶ PhD in Applied Mathematics, Sheffield University

<http://www.cerulogy.com>  
<https://scholar.google.co.uk/citations?user=Y16zidkAAAAJ&hl=en&oi=ao>

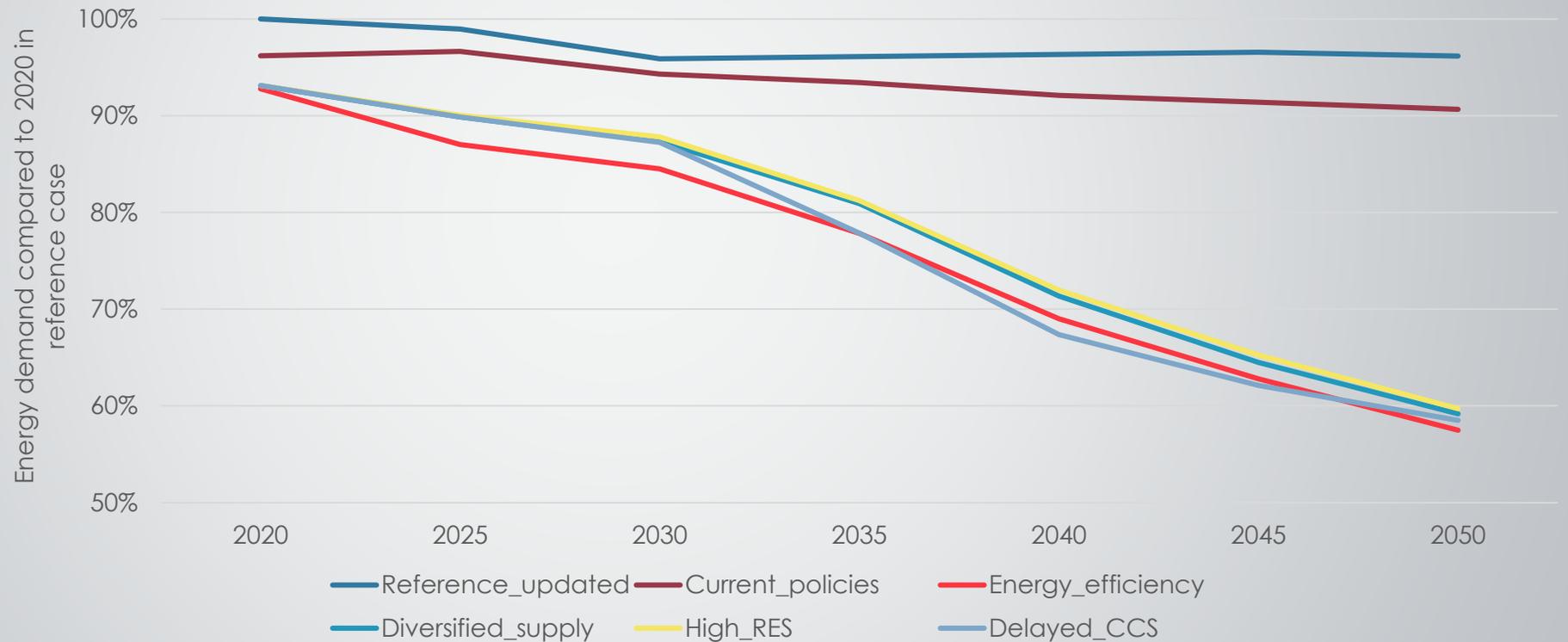


# Contents

- ▶ How did we get here?
- ▶ Where are we now?
- ▶ Where are we going?



# Context – reducing transport energy demand



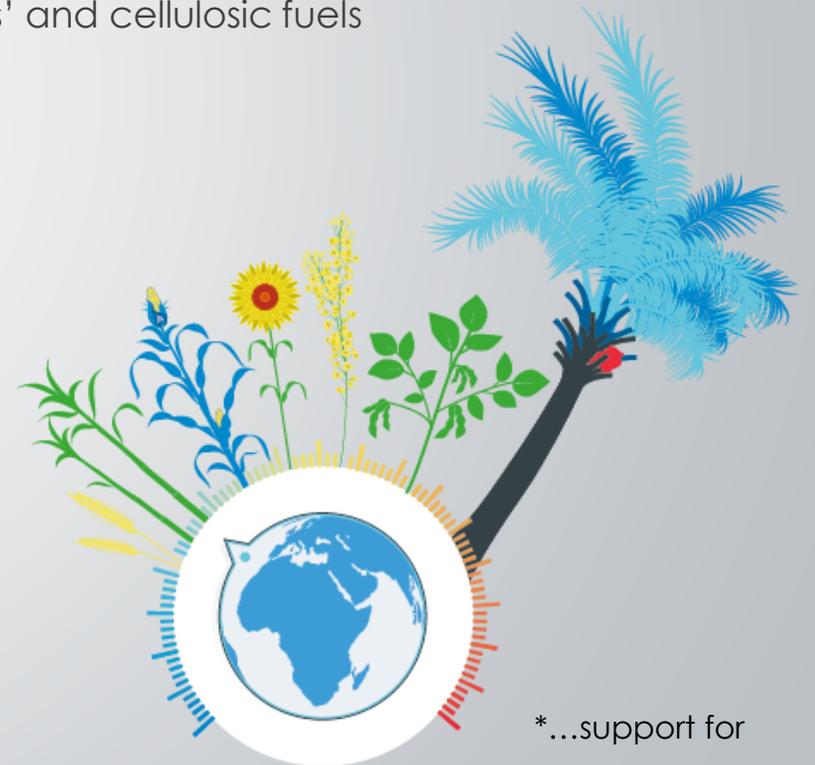
# How did we get here?

RED, FQD, ILUC, ETS



# EU low carbon fuels, 2010-2020

- ▶ EU biofuel industry is policy created and sustained
- ▶ Energy mandate under the Renewable Energy Directive (RED), GHG mandate under Fuel Quality Directive (FQD)
  - ▶ Double counting for fuels from 'wastes and residues' and cellulosic fuels
  - ▶ Basic sustainability criteria
  - ▶ Not effective as advanced biofuel policy
- ▶ ILUC/food vs. fuel debate
  - ▶ Enthusiasm for 1G biofuels is reduced
  - ▶ No real agreement on regulating ILUC
- ▶ ILUC Directive amends RED/FQD
  - ▶ Cap\* 1G fuels
  - ▶ Indicative ILUC numbers
  - ▶ Non-binding advanced biofuel target



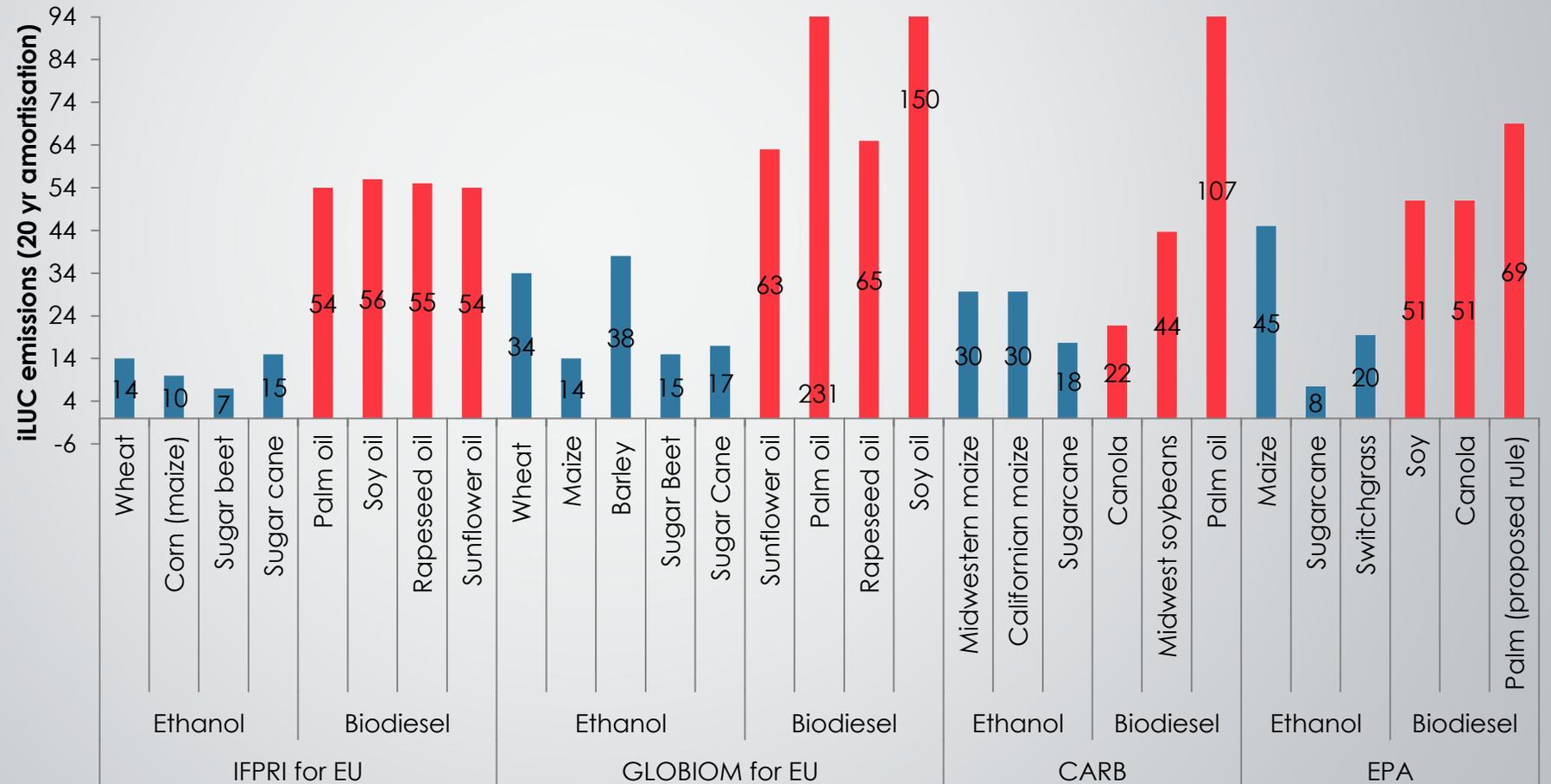
\*...support for

# What hasn't worked?

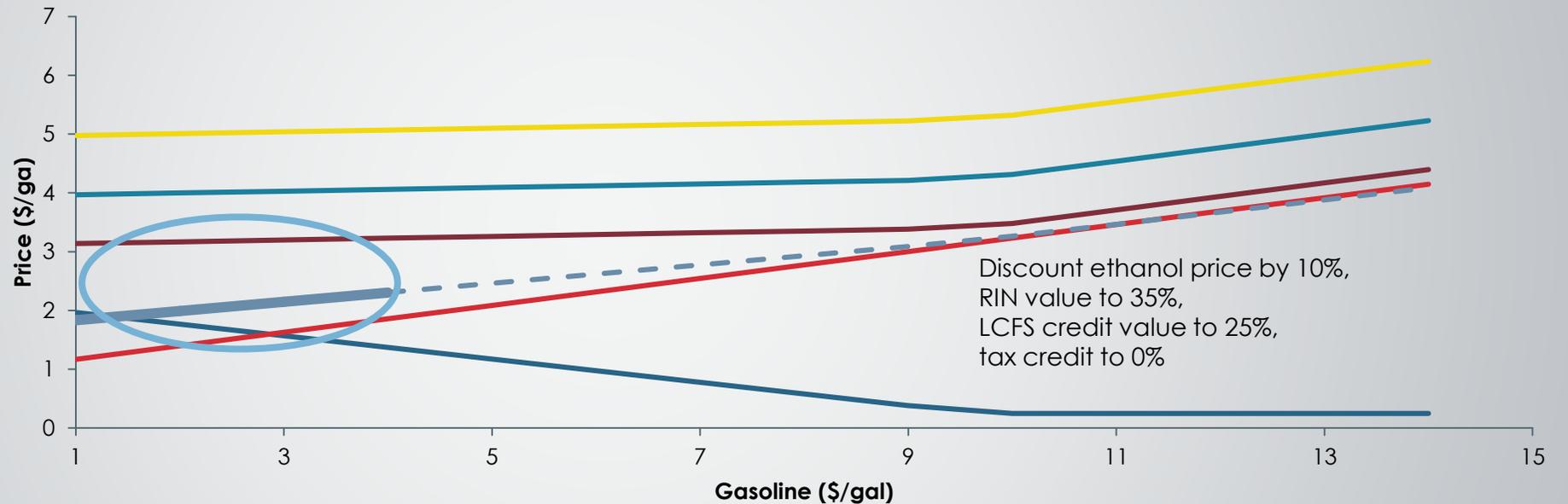
- ▶ Indirect land use change (ILUC) – biofuel support policy has probably driven agricultural expansion in a way that undermines policy goals
  - ▶ Analysing and reacting to ILUC remain enormously controversial, but central to the effectiveness of policy
  - ▶ There's also food vs. fuel, which is controversial at every level
  - ▶ Sustainability uncertainty leads to policy uncertainty leads to value uncertainty
- ▶ Cellulosic fuel technologies have been held out as the near future for a decade and more – but we haven't got far
  - ▶ Compare to recent excitement about power to liquids fuels
- ▶ Sustainability governance is challenging, and generally decried as too weak when reviewed
  - ▶ Voluntary standards have provided more assurance than legal requirements



# Indirect land use change estimates from regulatory studies



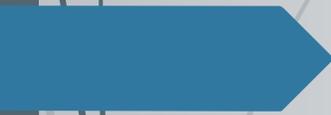
# Discounting the value proposition for uncertainty



- Cellulosic Ethanol Waiver Prices (CWCs)
- Projected Brazilian Sugarcane Ethanol Prices
- Cellulosic Ethanol Price with RIN
- Cellulosic Ethanol in California
- Cellulosic Ethanol in California with 2GBPTC
- Discounted Expected Cellulosic Ethanol Price



*This is out of date now, but illustrates the point!*



# Where are we now?

Out with the RED, in with RED II

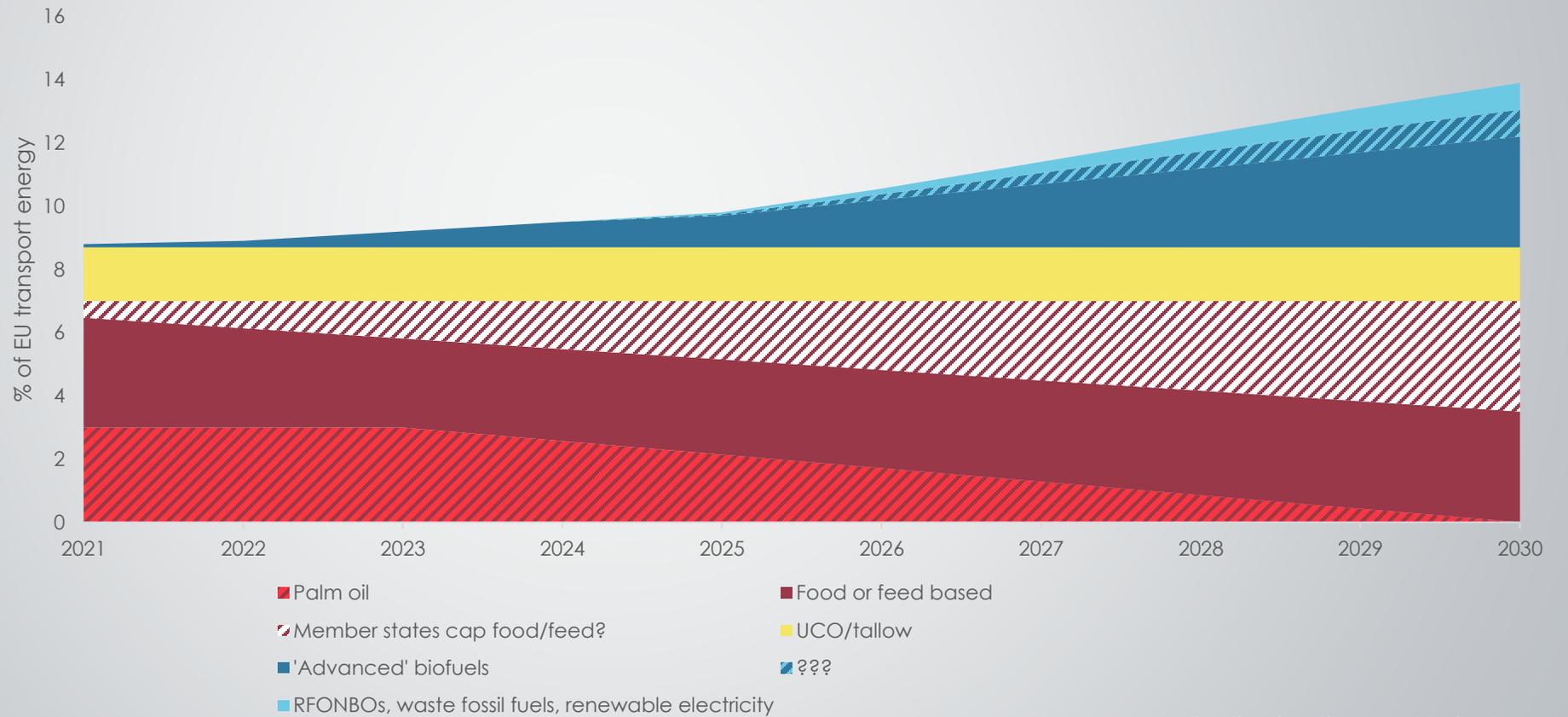


# RED II

- ▶ Creates a more 'nested' set of targets
  - ▶ Advanced (Annex IX A) biofuels > residue based (Annex IX B) biodiesel > RFONBOs and recycled carbon fuels > other non-food biofuels > food based biofuels > high ILUC-risk biofuels (palm oil)
- ▶ Advanced biofuels receive strongest ever EU support
- ▶ Flexibility at the Member State level (Directive not Regulation)
  - ▶ Choosing trajectories
  - ▶ Implementing mechanism
  - ▶ Volume vs. energy vs. GHG targets
  - ▶ Food cap
  - ▶ Recycled carbon fuels
  - ▶ Cap on Annex IX Part B
  - ▶ Double counting
  - ▶ Further ILUC-related differentiation



# Illustrative supply scenario



Indicative fractions and trajectory



# Other elements

- ▶ High ILUC-risk fuels\* to be phased out by 2030
  - ▶ Commission proposal identifies palm oil (review due by 2021)
  - ▶ Treatment of PFAD likely to be decided at Member State level
- ▶ Low ILUC-risk biofuel certification
  - ▶ Additionality-assessed yield projects
  - ▶ Abandoned and degraded land projects
  - ▶ Smallholder yield projects
  - ▶ *Only regulatory value is to palm oil projects (MS could expand this)*
- ▶ Enhanced incentives for aviation/maritime fuels (1.2x multiplier)



\*Associated with 'significant' conversion of high carbon-stock landscapes

# Where are we going?

Advanced biofuels, co-processing, PtL, aviation



# Big questions!

- ▶ What outlook for advanced biofuels?
  - ▶ Targets provide a much stronger signal
  - ▶ Value proposition still very unclear
  - ▶ Depends on Member State implementations
  - ▶ Sensitive to competition
- ▶ What about other advanced low carbon fuels?
  - ▶ Cost outlook for electrofuels (RFONBOs) more difficult than advanced biofuels
  - ▶ Place of recycled carbon fuels sensitive to implementation
- ▶ Modal choices?
  - ▶ Non-CO<sub>2</sub> effects may make aviation environmentally preferable market
  - ▶ Multiplier + CORSIA could add value for aviation applications
  - ▶ Tougher fuel specs and limited airline willingness to pay may however leave road transport as dominant market
- ▶ Is RED II 'fit for purpose'?
  - ▶ The framework is solid (given what was on the table)
  - ▶ Implementation decisions crucial
  - ▶ Now probably not the time to consider yet another round of revision!



# Opportunities

- ▶ Fuel suppliers (incl. refiners and importers) likely to remain as regulated parties under RED II
  - ▶ Puts industry at the centre of RED II decision making, like it or not!
- ▶ While liquid fuel demand will reduce, it will certainly not disappear
- ▶ Co-processing/retrofitting to utilise existing refinery capacity
  - ▶ HVO
    - ▶ Not palm oil, ideally not food oils, preferably not PFADs
    - ▶ Opportunity to enter market for sustainable oilseeds? (Cf. UPM and carinata)
  - ▶ Pyrolysis oils
    - ▶ Co-processing in existing refineries identified in some studies as a lower cost BtL pathway
    - ▶ Engineering issues relating to pyrolysis oil must be managed
  - ▶ FT wax upgrading



# Conclusions

- ▶ A decade of great uncertainty is giving way to a decade of less uncertainty
- ▶ It's still hard to pin down the future value proposition from policy to low carbon fuels in € per litre





Thanks!

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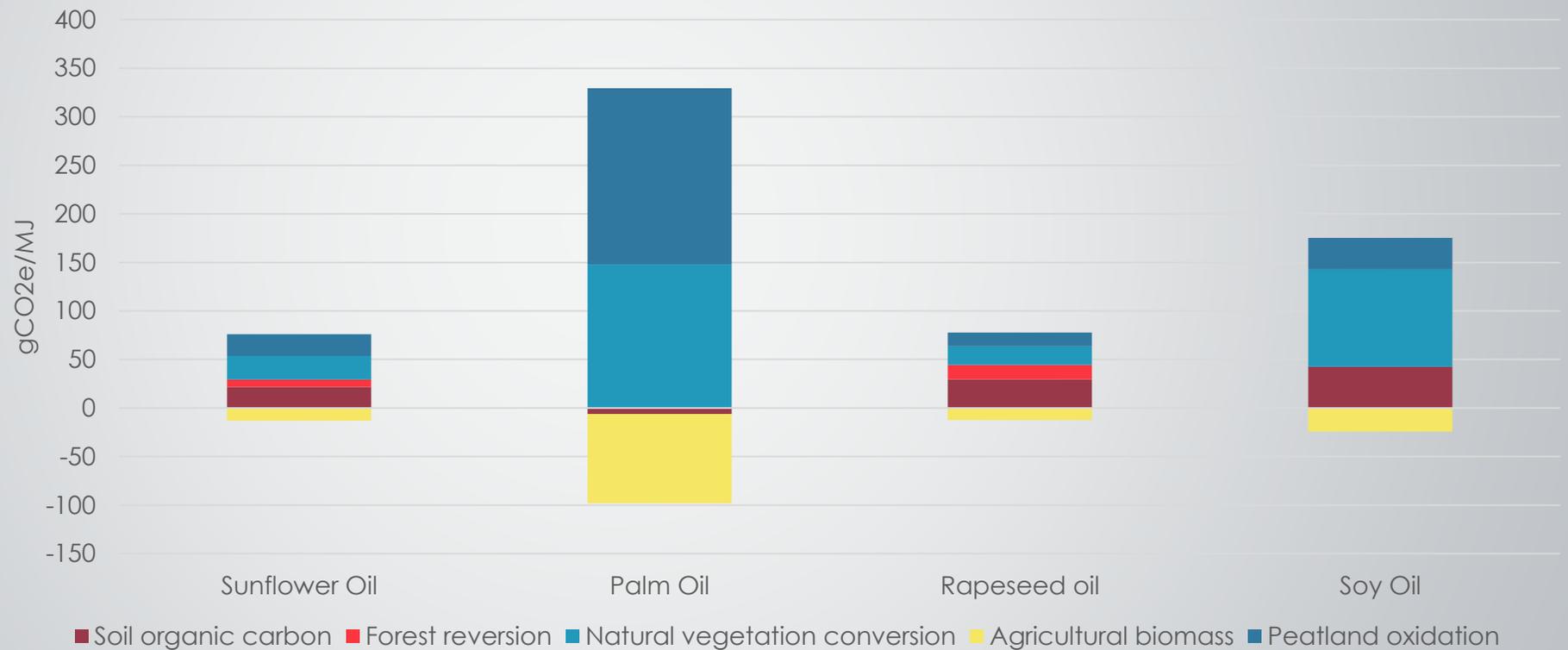


Here's one I made earlier

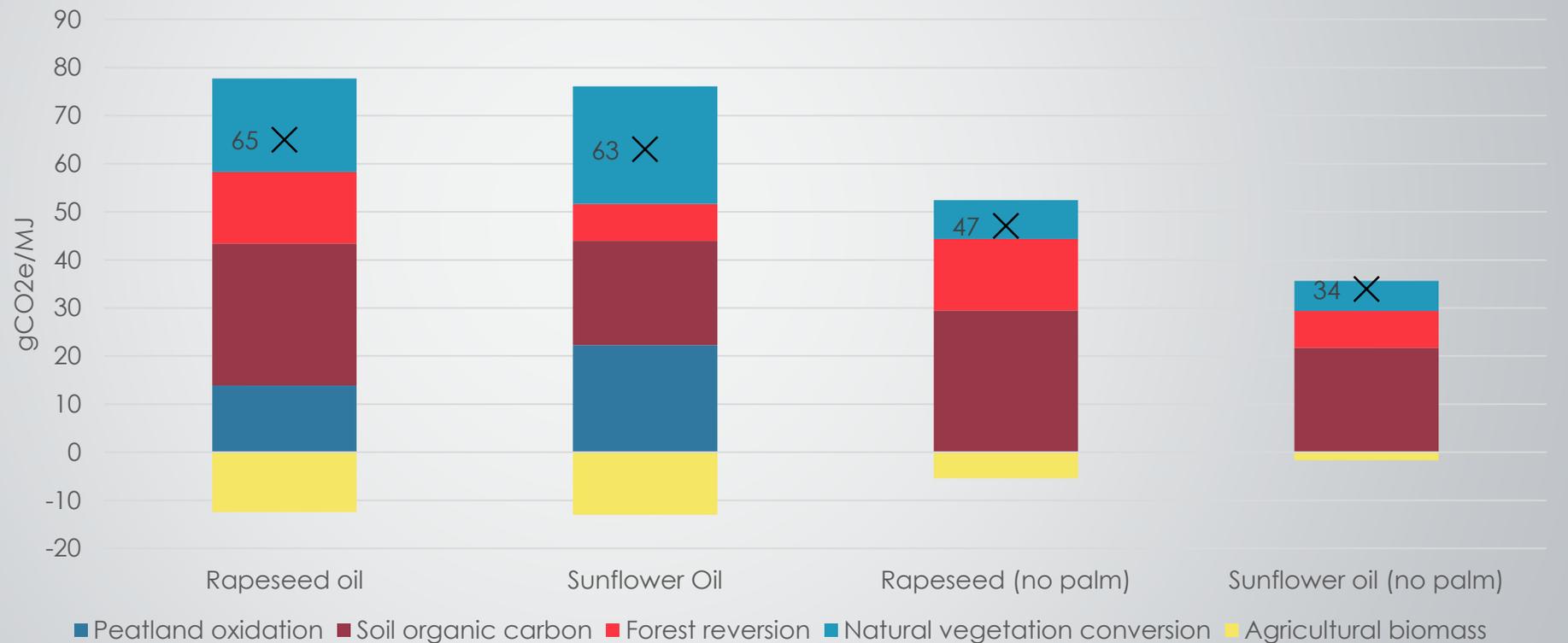
Slides for potential questions



# ILUC – would everything be fine if we just got away from palm oil?



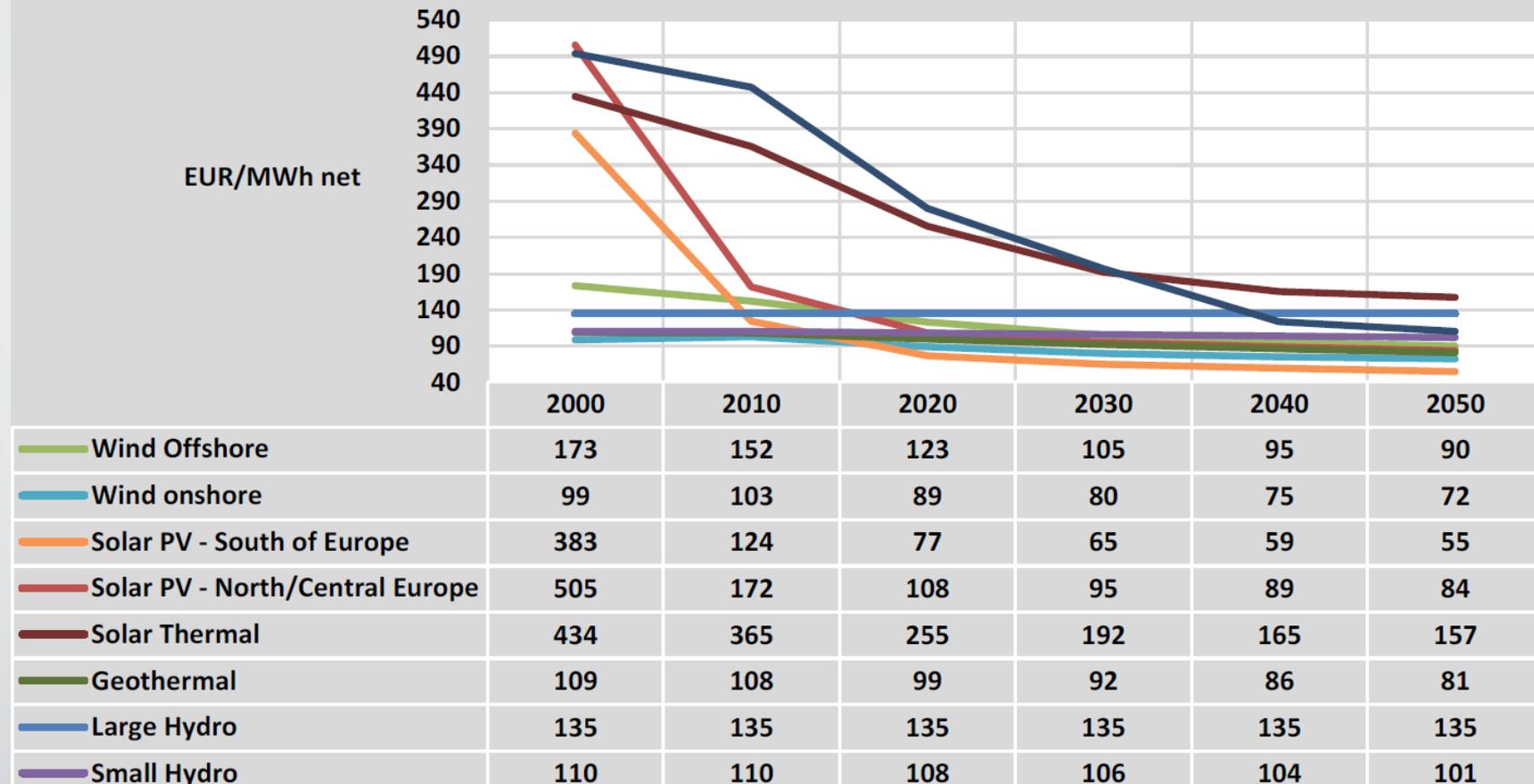
# Not really – both IFPRI-MIRAGE and GLOBIOM still bad for biodiesel



# Will renewable electricity be cheap?

## Levelized cost of power generation of new plants

Assumptions: Annual capital cost at WACC 7.5% real, operating hours per year as observed today



# Transport energy demand

