



Reactive Guidance

17 March 2017

Clarification Request

Are fuels made from the renewable component of end-of-life tyres eligible for certification under RSB EU RED?

Reactive Guidance

This reactive guidance is valid for certifications against version 1.1 of the *Consolidated RSB EU RED Standard for certification of biofuels based on waste and residues* (RSB-STD-11-001-01-010). This reactive guidance does not give any projections about future requirements of this standard.

RSB-STD-11-001-01-010 states in section G “Eligibility” that

“A waste or a residue qualifies under this RSB standard if:

- It is explicitly defined as such by the European Commission or an EU Member State; and/or
- It is listed in the positive list in Annex I;“

RSB EU RED allows for three pathways to the eligibility of a feedstock:

1. Explicitly defined as waste or residue by the European Commission
2. Explicitly defined as waste or residues by an EU Member state
3. Listed in the positive list in Annex I of RSB-STD-11-001-01-010

End-of-life tyres are currently not explicitly defined as waste or residues by the European Commission nor listed on the positive list in RSB-STD-11-001-01-010. In the current version 1.1 of the standard, end-of-life tyres are therefore only eligible if explicitly defined as waste or residues by an EU Member state.

An example of this can be found in the UK RFTO Guidance (Valid from 15 November 2016-RFTO Year 9, Version 9.2):

Material	Description	Valid From
Renewable component of end - of-life tyres	Tyres are manufactured from a mixture of non-renewable petroleum products and natural rubber. Suppliers of fuel made from end-of-life tyres will need to have a Fuel Measurement and Sampling (FMS) regime in place, and will need to demonstrate how they have apportioned the renewability of the material in terms of the outputs from the conversion process of the tyres into fuel as the conversion process usually produces solid, liquid and gaseous fractions. End-of-life tyres are a waste	15/5/13



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Conclusion:

Fuels made from the renewable component of end-of-life tyres are eligible for certification under RSB-STD-11-001-01-010 (version 1.1) if the following conditions are met:

1. Material is listed as a waste by an EU Member state, e.g. UK under the RFTO
2. The requirements as described by the EU member state are met, e.g.
“Suppliers of fuel made from end-of-life tyres will need to have a Fuel Measurement and Sampling (FMS) regime in place, and will need to demonstrate how they have apportioned the renewability of the material in terms of the outputs from the conversion process of the tyres into fuel as the conversion process usually produces solid, liquid and gaseous fractions.” (UK RFTO Guidance, Valid from 15 November 2016-RFTO Year 9, Version 9.2).