

Reactive Guidance taken from RSB-STD-01-010 RSB Standard for advanced fuels: Flexible Attribution for Fuel Operators

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1. Interpretation requested for the following scenario:

In this scenario, an operator would like to use the flexible attribution approach to attribute sustainability characteristics of certified sustainable aviation fuel from one site to conventional kerosene at another site.

The scenario would be applicable to other fuels (biofuels, co-processed fuels and advanced fuels) where the alternative and the conventional fuel have similar chemical characteristics and where both producer sites have similar conversion factors that don't deviate by more than 5%. In cases where there is a small deviation, the lower conversion factor site should be used in the calculations.

This guidance is only applicable to biofuels and advanced fuels up to the blending point, however not to RFNBO products or e-fuels.

2. Applicable Standards

RSB-STD-01-010 RSB Standard for advanced fuels: Section 2.4 'Requirements for blending and/or co-processing virgin fossil sources with biogenic sources', clause 2.4.2c, in combination with 2.4.5.

3. Guidance

The below is taken from the STD-01-010 Advanced Fuels section 2.4.5 and refers to the requirements around Flexible Attribution of fuels:

1. Document the following:

- the amount of bio-based or eligible non-biogenic feedstock that is used as material in the system,
- the carbon content (% w/w) of the biogenic or eligible non-biogenic feedstock entering the industrial process, and
- the quantification of losses, by mass, in the production unit, for each lost material,
- Note: Feedstock that is used for internal energy production or other auxiliaries, which will not be present in a final product, shall not be considered in balance.

As guidance for this, the operator should have a comprehensive mass balance tracking system in place for both sites and can attribute the fuels with a correction on the volume, based on carbon content of the fuels.

Where the carbon content for both products is not available, lower heating value (LHV) can be used in its place.

The original wording outlines the approach for advanced fuels, however this guidance extends this to conventional biofuels and co-processed fuels as well, only excluding RFNBOs until such a time as guidance can be written on this.

2. Have a documented book-keeping system in place to monitor the balance of bio-based or eligible non-biogenic feedstock that have been added to the system and advanced fuel withdrawn from the system (i.e. sold to customers).

Point 2 should be maintained in full and shown to the auditor at audit, adding the aforementioned inclusion of biofuels and co-processed fuels.

3. Ensure that bio-based or eligible non-biogenic feedstock and advanced fuel claims are balanced within a 3-month period. Within the balancing period, a deficit may occur, as long as a non-negative balance is achieved over the 3-months-period.

A positive balance may be reported into the next reporting period.

Point 3 should be maintained in full and shown to the auditor at audit – the 3 month period should not be broken for any reason and in doing so would result in a critical non-conformity by the auditor.

4. The boundary of the assessment shall be:

- one site, or
- several sites at the same geographic location which are connected with pipelines or other means of transport, or
- sites at different geographic locations if the operator can ensure and demonstrate for all sites that double-booking does not occur, e.g. by limiting the boundary to one legal entity or by having specific contractual relationships in place

This requirement relates to the boundary of the book-keeping system. The standard allows the system to be set up as a multi-site system, as long as it is ensured that double-booking does not occur.

If the scope includes two sites at different geographic locations (for example one in Europe and one in the US), the standard allows that the product is produced at one site and sold at the other site.

The conditions for this site transfer are:

- Both sites are covered by the scope of the same certification (if this is not the case then a book and claim approach would be more appropriate);
- The material has a similar lower heating value (for example SAF and Jet-A or Diesel and Biodiesel);
- Measures are in place to ensure that there is no double booking and proof provided to the auditor that this is the case;
- Auditors must have access to both sites and their documentation to verify that the claim is only made once;

- Carbon conversion efficiencies (RSB-STD-01-010-RSB-Standard-for-advanced-fuels - Annex 4) should be taken into account at both sites. The carbon conversion efficiencies at the sites should not differ by more than 5% in order to be eligible for this approach and the lower value site should be used in calculations.
- The sites do not both need to be producer sites, provided the above information is available around both fuels. In this case, the biobased portion should come from the producer / co-processing site, while the conventional can come from a storage or trader site. Both would still need to be included within the scope of certification.
- Flexible allocation can only occur up to the blend point where biofuels are blended with conventional fuels - a book and claim approach shall be used for blended fuels after this point.

Scenario using flexible allocation:

