

## Complementary assessment table for the certification of RFNBOs and RCF

### Summary

An assessment has been made on compliance of the [scheme name], as submitted to the European Commission for recognition, with the requirements for certifying compliance with the criteria for producing renewable fuels of non-biological origin (RFNBOs) and recycled carbon fuels (RCF) set out in Commission Delegated Regulation (EU) 2023/1184 and Commission Delegated Regulation (EU) 2023/1185. The requirements complement the general requirements for ensuring standards of reliability, transparency and independent auditing required by Directive 2018/2001 for certifying compliance with the sustainability and greenhouse gas saving criteria.

[The assessment results indicate a number of issues with specific requirements for certifying RFNBOs and RCF. Requirements and recommendations are detailed further in this document.]

### OR

[The assessment results indicate that the [scheme] meets the requirements for certifying RFNBOs and RCF.]

### Assessment results

The scope of the scheme is presented in the table below. The detailed assessment results are available in Annex 1.

## Assessment of the scope of the scheme

Scope	Covered	Comment
Production of renewable fuels of non-biological origin (RFNBOs) from:		
partially renewable electricity	<b>N</b>	
fully renewable electricity: Direct connection	<b>N</b>	
fully renewable electricity: Grid connection	<b>N</b>	
Combinations	<b>N</b>	
Production of RFNBOs in third countries	<b>N</b>	
Recycled carbon fuels (RCF)	<b>N</b>	
Calculation of emission intensity of RCF and RFNBOs	<b>N</b>	

## Annex 1: Detailed assessment results

### Methodology for producing RFNBOs and determining greenhouse gas emissions savings of RFNBOs and RCF

Scope and Definitions		
Requirement	Guidance	Assessment
Definitions	<ul style="list-style-type: none"> <li>• Provide guidance ensuring compliance with the use of defined terms are used:</li> <li>• Distinguish between RCF, RFNBOs and other fuels</li> <li>• "bidding zone"</li> <li>• "direct line"</li> <li>• "installation generating renewable electricity"</li> <li>• "fuel producer"</li> <li>• "come into operation"</li> <li>• "smart metering system"</li> <li>• "imbalance settlement period"</li> </ul>	<div style="background-color: red; color: white; text-align: center; font-weight: bold; padding: 5px;">N</div> <p>[document name and section]</p> <ul style="list-style-type: none"> <li>• "quote"</li> <li>• "quote"</li> </ul> <p><b><u>Requirement:</u></b></p> <ul style="list-style-type: none"> <li>• xxx</li> </ul>

1. Greenhouse gas emissions savings		
Requirement	Guidance	Assessment
<p>1.1 Set out the minimum requirements for the greenhouse gas emission savings from the use of RFNBOs and RCF</p>	<ul style="list-style-type: none"> <li>Article 25(1) sets out RFNBOs have to achieve at least 70% emissions savings</li> <li>Article 2 of the GHG methodology sets out that recycled carbon fuels have to achieve at least 70% emissions savings.</li> </ul>	<p><b>N</b> [document name and section]</p> <ul style="list-style-type: none"> <li>"quote"</li> <li>"quote"</li> </ul> <p><b>Requirement:</b></p> <ul style="list-style-type: none"> <li>xxx</li> </ul>
<p>1.2 Correct representation of formula, methodology and data</p>	<ul style="list-style-type: none"> <li>The methodology for assessing greenhouse gas emissions savings is set out in the Annex to Commission Delegated Regulation (EU) 2023/847</li> </ul>	<p>[document name and section]</p> <ul style="list-style-type: none"> <li>"quote"</li> <li>"quote"</li> </ul> <p><b>Requirement:</b></p> <ul style="list-style-type: none"> <li>xxx</li> </ul>
<p>1.3 Rules for determining the amounts of RFNBOs and RCF produced including instructions co-processing and for determining the emission intensity of fuels</p>	<ul style="list-style-type: none"> <li>Include general formula for calculation of the emission intensity of a process using different types of inputs</li> <li>Explain which types of inputs are considered in the numerator and denominator</li> <li>Include rules for co-processing</li> <li>Set correct timeframe for calculation of the average</li> </ul>	<p><b>N</b> [document name and section]</p> <ul style="list-style-type: none"> <li>"quote"</li> <li>"quote"</li> </ul> <p><b>Requirement:</b></p> <ul style="list-style-type: none"> <li>xxx</li> </ul>

	<ul style="list-style-type: none"> <li>Explain rules for averaging of emissions of fuels meeting 70% emission savings</li> </ul>		
1.4 Calculation of e <sub>exe-use</sub>	<p>Include requirements for</p> <ul style="list-style-type: none"> <li>Eligible CO2 sources</li> <li>Rules for sourcing fossil-based CO2 including an effective carbon pricing system and the phase out</li> <li>RCF feedstock</li> </ul>	<b>N</b>	<p>[document name and section]</p> <ul style="list-style-type: none"> <li>"quote"</li> <li>"quote"</li> </ul> <p><b><u>Requirement:</u></b></p> <ul style="list-style-type: none"> <li>xxx</li> </ul>
1.5 Detailed instructions for distinction between rigid and elastic inputs	<ul style="list-style-type: none"> <li>See points 4,7 and 9 of the emission calculation methodology</li> </ul>		<p>[document name and section]</p> <ul style="list-style-type: none"> <li>"quote"</li> <li>"quote"</li> </ul> <p><b><u>Requirement:</u></b></p> <ul style="list-style-type: none"> <li>xxx</li> </ul>
1.6 Detailed instructions for calculating emission intensity of grid electricity in countries or bidding zones	<ul style="list-style-type: none"> <li>See points 5 and 6 of the emission calculation methodology and Chapter C of the Annex</li> </ul>		<p>[document name and section]</p> <ul style="list-style-type: none"> <li>"quote"</li> <li>"quote"</li> </ul> <p><b><u>Requirement:</u></b></p> <ul style="list-style-type: none"> <li>xxx</li> </ul>

<p>1.7 Determination of the emission intensity over the supply chain.</p>	<ul style="list-style-type: none"> <li>• See point 8 of the emission calculation methodology</li> </ul>	<p>[document name and section]</p> <ul style="list-style-type: none"> <li>• "quote"</li> <li>• "quote"</li> </ul> <p><b><u>Requirement:</u></b></p> <ul style="list-style-type: none"> <li>• xxx</li> </ul>
<p>1.8 Allocation of emissions to products and co-products</p>	<ul style="list-style-type: none"> <li>• See point 15 of the emission calculation methodology</li> </ul>	<p>document name and section]</p> <ul style="list-style-type: none"> <li>• "quote"</li> <li>• "quote"</li> </ul> <p><b><u>Requirement:</u></b></p> <ul style="list-style-type: none"> <li>• xxx</li> </ul>

2. Production criteria for RFNBOs		
Requirement	Guidance	Assessment
2.1 Rules for producing RFNBOs from partially renewable electricity	<ul style="list-style-type: none"> <li>Specify requirements for implementation of set out in the fourth subparagraph of Article 27(3) RED</li> </ul>	<p><b>N</b> [document name and section]</p> <ul style="list-style-type: none"> <li>"quote"</li> <li>"quote"</li> </ul> <p><b>Requirement:</b></p> <ul style="list-style-type: none"> <li>xxx</li> </ul>
2.2 Rules for sourcing electricity from directly connected installations	<ul style="list-style-type: none"> <li>Specify requirements in line with Article 3 of the additionality delegated act including: <ul style="list-style-type: none"> <li>Relevant definitions</li> <li>Eligibility of RES-E installations</li> <li>Requirements for smart metering and prevention of use of use of grid electricity</li> </ul> </li> </ul>	<p><b>N</b> [document name and section]</p> <ul style="list-style-type: none"> <li>"quote"</li> <li>"quote"</li> </ul> <p><b>Requirement:</b></p> <ul style="list-style-type: none"> <li>xxx</li> </ul>
2.3 Rules for sourcing renewable electricity from the grid:	<ul style="list-style-type: none"> <li>Specify requirements in line with Articles 4 - 11 of the additionality delegated act, concerning</li> <li>Specific rules for sourcing of renewable electricity in bidding zones where the</li> </ul>	<p><b>N</b> [document name and section]</p> <ul style="list-style-type: none"> <li>"quote"</li> <li>"quote"</li> </ul> <p><b>Requirement:</b></p> <ul style="list-style-type: none"> <li>xxx</li> </ul>

	<p>share of renewable electricity exceeds 90%. (Article 4(1))</p> <ul style="list-style-type: none"> <li>• Specific rules for sourcing of renewable electricity in bidding zones with emission intensity of electricity &lt; 18 g CO<sub>2</sub>eq/MJ. (Article 4(2))</li> <li>• Specific rules for sourcing of renewable electricity that prevents curtailment renewable electricity generation. (Article 4(3))</li> <li>• Other cases, where compliance with additionality and temporal and geographic correlation is required. (Article 4(4))</li> </ul>		
2.3.2 Requirements additionality	<ul style="list-style-type: none"> <li>• Specify requirements in line with Article 5 of the additionality delegated act including for:</li> <li>• Renewables PPAs</li> <li>• Requirements for renewable installations generating renewable electricity</li> <li>• Transitional phase</li> </ul>		<p>[document name and section]</p> <ul style="list-style-type: none"> <li>• "quote"</li> <li>• "quote"</li> </ul> <p><b>Requirement:</b></p> <ul style="list-style-type: none"> <li>• xxx</li> </ul>
2.3.3 Requirements temporal correlation	<ul style="list-style-type: none"> <li>• Specify how the requirements set out in Article 6 of the additionality delegated act are implemented including the phase in period and the Article 6 third subparagraph</li> </ul>	<b>N</b>	<p>[document name and section]</p> <ul style="list-style-type: none"> <li>• "quote"</li> <li>• "quote"</li> </ul> <p><b>Requirement:</b></p> <ul style="list-style-type: none"> <li>• xxx</li> </ul>



2.3.4 Requirements geographic correlation	<ul style="list-style-type: none"> <li>Specify how the requirements set out in Article 7 of the additionality delegated act are implemented, including the provisions on</li> <li>Offshore bidding zones</li> <li>Interconnected bidding zones</li> <li>National requirements</li> </ul>	<b>N</b>	<p>[document name and section]</p> <ul style="list-style-type: none"> <li>"quote"</li> <li>"quote"</li> </ul> <p><b>Requirement:</b></p> <ul style="list-style-type: none"> <li>xxx</li> </ul>
2.3.5 Implementation of equivalent rules in third countries (rules for a case-by case assessment)	<ul style="list-style-type: none"> <li>Specify how the concept of bidding zones is implemented in third countries</li> <li>Specify under which circumstances the provisions on curtailment set out in Article 4(3) can be applied</li> <li>Specify under which circumstances the provisions on temporal correlation set out in Article 6 third subparagraph can be applied</li> </ul>	<b>N</b>	<p>[document name and section]</p> <ul style="list-style-type: none"> <li>"quote"</li> <li>"quote"</li> </ul> <p><b>Requirement:</b></p> <ul style="list-style-type: none"> <li>xxx</li> </ul>
2.4 Combination of electricity sourcing options	<ul style="list-style-type: none"> <li>Specify how fuel producers can combine the available options for sourcing renewable electricity</li> </ul>	<b>N</b>	<p>[document name and section]</p> <ul style="list-style-type: none"> <li>"quote"</li> <li>"quote"</li> </ul> <p><b>Requirement:</b></p> <ul style="list-style-type: none"> <li>xxx</li> </ul>

2.5 Cancellation of GOs	<ul style="list-style-type: none"> <li>• Include requirements on Guarantees of Origin that comply with the general requirements in article 19 of RED and furthermore carry the same attributes as the physical installation producing the electricity</li> <li>• Article 19 RED applies only in the EU</li> </ul>	<b>N</b>	<p>[document name and section]</p> <ul style="list-style-type: none"> <li>• "quote"</li> <li>• "quote"</li> </ul> <p><b><u>Requirement:</u></b></p> <ul style="list-style-type: none"> <li>• xxx</li> </ul>
2.6 Data storage and management	<ul style="list-style-type: none"> <li>• Specify how fuel producers fulfil the requirements set out in Article 8</li> </ul>	<b>N</b>	<p>[document name and section]</p> <ul style="list-style-type: none"> <li>• "quote"</li> <li>• "quote"</li> </ul> <p><b><u>Requirement:</u></b></p> <ul style="list-style-type: none"> <li>• xxx</li> </ul>
2.7 Specific rules for audits of RFNBO production)	<ul style="list-style-type: none"> <li>• Complement the auditing rules by dedicated rules for audits of RFNBO and/or RCF producers</li> </ul>	<b>N</b>	<p>[document name and section]</p> <ul style="list-style-type: none"> <li>• "quote"</li> <li>• "quote"</li> </ul> <p><b><u>Requirement:</u></b></p> <ul style="list-style-type: none"> <li>• xxx</li> </ul>