

Low Carbon Fuels Fund

Stakeholder enquiries and responses for Window 1

Pre-populated likely enquiries and responses

Ref	Question	Response
TECHNOLOGY PATHWAYS		
1	Are precursor/intermediate fuel supply chain projects eligible?	Precursor/intermediate fuel projects on their own are not eligible, as they do not produce SAF. As per footnote 3 of the LCFF guidance document, they may only be eligible if: - the feedstocks used in the precursor facility meet the LCFF feedstock eligibility criteria; - the precursor facility and SAF facility are both located in the UK; - project partners from the SAF facility are formally involved as project partners in the precursor facility; - there are at least Heads of Terms already signed between the facilities for at least 80% of the precursor/intermediate fuel to be consumed as feedstock in the SAF facility; and - both facilities are part of the same LCFF application. If evidence for each item on this list is not provided, only the SAF facility would likely be eligible. If the precursor facility is abroad and the SAF facility is in the UK, only the SAF facility could be eligible. If the precursor facility is in the UK and the SAF facility is abroad, neither will be eligible.
2	If a joint application consisting of two projects, is submitted, is it permissible for one project to be awarded and not other if deemed more aligned with DfT objectives or would both projects be rejected due the joint application?	It is only advisable for a joint application containing two projects to be submitted if: - they are separate demonstration and FOAK commercial projects for the same technology pathway - they are the precursor production project and then upgrading project for a combined technology pathway, provided the evidence requirements in the response to Question 1 are also met. Under these two situations, it could be possible that DfT only funds one of the two projects. Ineligibility of one project will not rule the other project ineligible, and any eligible project within an application will still be scored. Please ensure that your two projects are very clearly distinguished throughout the application, including whenever any scales, fuel production, GHGs, revenues & costs, benefits are discussed. Provide breakdowns by duplicating any application form tables and Appendices as necessary. If you are planning on submitting a joint application containing two different technology pathways, regardless of whether these projects will be on the same site or separate sites, we would strongly encourage you to submit two separate LCFF applications, unless these two pathways are co-dependent on each other. A non-PTL project that is considering adding PTL elements (such as supplementary green H2 feedstock) will still share technology process units downstream to create jet fuel, in which case a single LCFF application would still be appropriate.

Ref	Question	Response
3	Are the following two facilities eligible for the LCFF? The first is an alcohol plant that takes in two thirds waste biomass, and one third blue hydrogen (on a LHV energy basis). Two thirds of the alcohol is sold as wholly biogenic to a UK Alcohol-to-Jet plant to create bioSAF, and the remaining third is separately sold as wholly fossil into other industries. If the blue H2 energy is mass balanced into the fossil alcohol, are there issues in using subsidised blue H2?	The alcohol plant will not be eligible for the LCFF, because non-waste fossil hydrogen use is capped at 10% of the total jet output of a pathway (and alcohol production is relatively efficient). However, given that mass balancing of a precursor into wholly biogenic (or wholly fossil) alcohol consignments is permitted, the AtJ plant could still be eligible for the LCFF, if the waste biomass feedstock meets the LCFF eligibility rules and sufficient alcohol can be evidenced as sold to other industries as wholly fossil. Also see Question 1. The SAF Mandate does not yet have explicit rules regarding the allocation of subsidies, so you should evidence the size and type of the blue H2 subsidies, and why it would be appropriate to allocate the subsidies onto only the fossil alcohol, allowing the biogenic alcohol to avoid multiple incentive restrictions.
4	You recommend that different technology pathways (e.g. types of biomass gasification) should be submitted as separate applications. In that respect: (a) Could the same lead applicant submit two applications or are different entities required for that? (b) Could two separate projects share feedstock supply chains, offtakers and CCS infrastructures?	(a) Yes, the same lead applicant can apply multiple times, provided funding, staff resourcing, governance etc across all their projects are evidenced, i.e. a LCFF project could proceed without relying on another LCFF project being dropped or going ahead. (b) Yes, but again, the onus would be on each project application to evidence critical path dependencies and risks. Note that two variants of biomass gasification technology based on the same site (parallel train gasifiers from different suppliers), that have the similar feedstock supplies, the same shared syngas to fuels processing train, same CCS network and same fuel offtakers, would not warrant two separate applications.
5	Our plant concept is focused on bioSAF, but we are exploring adding green hydrogen to utilise syngas CO2 and maximise the SAF output. How should these options be included in the application?	If you have a non-PTL project that is considering adding PTL elements (e.g. injecting supplementary green H2 into a biomass-generated syngas), it is OK to include this as a single LCFF application, but you should very clearly separate out the activities, budgets, timelines, revenues & costs, scales, risks, GHG emissions etc of these two separate plant concepts, duplicating application form tables and Appendices as needed.
6	If a process uses RDF as the primary feedstock for syngas and FT-SAF, and the CO2 generated is then converted by reaction with RNG to produce further syngas for SAF, would it be acceptable to use RNG by mass balance as a secondary feedstock? The RNG will be under certification and derived from eligible feedstocks such as waste biomass or RCF.	Yes, this would be acceptable provided the RTFO Biomethane guidance rules are followed and evidenced. This third consignment should use a separate Appendix H file (from the other two consignments, the biogenic fraction of RDF and the fossil fraction of RDF). Note that the RNG has to be evidenced as being derived from LCFF eligible feedstocks (e.g. for biomass feedstocks, those listed as not subject to the HEFA cap on the DfT's list of feedstocks) and evidenced that any sustainability requirements are met.
7	Can the plant be a hybrid bioSAF/eSAF?	Yes. If your plant is a hybrid bioSAF/eSAF plant only by virtue of biogenic and synthetic feedstocks of the same feedstock type (e.g. biomethanol and e-methanol), please submit separate Appendix H GHG templates for both consignments, and also make clear the separate consignment volumes/pricing in Appendix E. If your plant is a hybrid bioSAF/eSAF plant by virtue of mixing of different feedstock types within the plant (e.g. biosyngas and green hydrogen), please email LCFF@WSP.com to request a hybrid version of Appendix H to complete, which can calculate (and iterate, due to any recycles) the different consignment GHG intensities. If you have follow-up questions about the GHG methodology, please contact DfT's Low Carbon Fuels team.
8	We use electricity in a plasma electrolyser system (PES) that produces a syngas (H2+CO) mixture from waste feedstock. The syngas is then processed in a Fischer-Tropsch reactor to produce the liquid syncrude. There are no other energy inputs. Therefore, does this count as PtL as we use only waste and electricity to produce jet fuel?	The eligibility of your LCFF application will, in part, depend on the sources of your feedstock(s). We need further information to advise if the waste feedstock is eligible, and how much of the electricity is a feedstock (and the eligibility of its source) or the electricity is purely a process input, and therefore what mix of consignment types will arise. If the electricity is from PTL-eligible sources, it appears likely that (at most) only some of the jet fuel might be PTL, given a biomass/RCF waste feedstock is being used.

Ref	Question	Response
FEEDSTOCKS		
9	For the CO2 source Head of Terms for a PtL project, can this be contingent on government support for carbon capture retrofit on that asset?	Please see Question 1 first. Yes, it can be contingent, but the Head of Terms still needs signed between the CO2 provider and PTL project. This CO2 source may not materialise, which will be factored into the risk profile of your application scoring. Your project, if selected, may have a starting Stage Gate to prove the CO2 capture has been successfully selected for government support. It is unlikely government support for the CO2 capture would need to be distributed to the CO2 provider, unless your PTL project were passing FID during the LCFF funding window, at which point it would likely be a Stage Gate condition.
10	Are you able to confirm which fossil CO2 sources are eligible? Would CO2 captured from fossil coal power plant be eligible for example?	Please read sections D.6-D.11 of the RTFO & SAF Mandate technical guidance. CO2 from fossil coal power stations could be eligible, provided this guidance is followed (around claims of emissions reductions from the power plant, meeting the definition of a waste, evidence of otherwise being emitted to atmosphere, and the fossil CO2 is not deliberately generated for the purposes of making transport fuel). Given there are no coal power stations left in the UK, this project would therefore have to rely on either transporting the CO2 to the UK (for PTL conversion in the UK in the LCFF project), or making an intermediate precursor to then ship to the UK (for upgrading in the UK in the LCFF project). Please also read Question 1.
11	Could you tell us whether CO2 from blue hydrogen production (as a waste product of that process) would be eligible as a CO2 feedstock?	From the point of view of the LCFF, this is not impossible, but is unlikely, as you would need to evidence that: - the H2 project is not claiming any emissions reductions for this CO2 provided to you (i.e. “grey” H2); - the CO2 meets the definition of a waste; - this CO2 would otherwise have been emitted to atmosphere (e.g. not sequestered); and - this fossil CO2 is not deliberately generated for the purposes of making transport fuel. Please ensure that the hydrogen project is aware of these constraints before setting up arrangements with this CO2 source. As there are no blue H2 projects in the UK currently operating, your application should make clear the location, scales, timings and contractual arrangements with this CO2 source, and consider the potential impacts of any delays. Even if this CO2 is shown to be eligible, the emissions associated with the added energy and chemicals to capture this CO2 will need to be included within Appendix H.
12	Tyre Pyrolysis Oil (TPO) contains both biogenic and fossil components. How does this impact a project’s overall eligibility, considering that the guidance currently only references fossil fractions of MSW and waste industrial fossil gases in relation to Recycled Carbon Fuels (RCFs)?	Eligible RCFs must be made from a designated RCF feedstock, as per the published feedstock list on the DfT website . This currently only lists two eligible RCF feedstocks (MSW and industrial waste gases), matching the LCFF guidance document. A facility generating TPO would not be eligible for the LCFF, due to the ineligible fossil fraction of the feedstock. However, mass balance rules could be used if an applicant wished to apply for only a TPO upgrading facility, and were to upgrade only the biogenic TPO consignment and evidence separate sales of the fossil TPO consignment.
13	To clarify - plastic waste is not eligible if it is purchased sorted, but unsorted waste is eligible?	Sorted plastic waste is not listed on the DfT list of feedstocks as being an eligible RCF feedstock, therefore is not eligible for the LCFF. In contrast, the fossil fraction of mixed MSW is listed, and is therefore eligible (as is the fossil fraction of the resulting intermediate RDF made from MSW). If you have questions about the eligibility of a specific feedstock, please email LCFF@WSP.com with more information.

Ref	Question	Response
14	Can you confirm whether you are classing landfill gas as generating PTL or a biofuel?	Landfill gas as an input feedstock is biogenic, so the resulting fuel consignment would be a biofuel. However, landfill gas is not listed as a waste/residue feedstock on the DfT website, so on its own is unlikely to be eligible for the LCFF. However, for the purposes of the LCFF, DfT do allow for the landfill gas to be traced back to the original feedstock (e.g. input Municipal Solid Waste to the landfill), provided there is evidence regarding the eligibility and sourcing of this original feedstock, and the emissions of the landfill "pre-processing" step (including leakage/venting/flaring) are included in Appendix H, as well as emissions back up the supply chain to the point of collection of the original waste/residue feedstock.
15	We would like to use a residue feedstock, which is listed as "Contact Administrator" under the RTFO and SAF Mandate list of feedstocks including wastes and residues. DfT indicated that for this feedstock we will need to provide proof that the feedstock is a residue. Would we need to provide such proof for the feedstock in the application, or can we provide this if we receive the grant, the testing protocol is defined, and we source the required amount for the testing?	Unless you plan to separately submit evidence directly to DfT regarding your feedstock status before the LCFF deadline, we would encourage you to include this evidence in your LCFF application, to ensure that your project passes the eligibility criteria checks. Given the unique "Contact Administrator" status of your proposed feedstock, if there is a remaining unresolved question as to your feedstock eligibility, at DfT's discretion, DfT may decide your project can be taken for full assessment. If your project scores well and is judged as a strong contender for funding, at DfT's discretion in light of other more certain funding demands, it could be recommended for funding but with a starting gate stage for the provision of the required feedstock evidence (i.e. funding would not start until this evidence is provided and feedstock eligibility confirmed). Feedstocks that are not on the DfT list of feedstocks will not be eligible for the LCFF, and so applications relying on these feedstocks will fail the eligibility check and will not be assessed. All biomass & RCF feedstocks used by a proposed LCFF project must be eligible.
16	What is required in respect of "compliance with the definition of a waste and with the waste hierarchy"?	Please see Annex K of the RTFO & SAF Mandate technical guidance .
17	For a 'hub-and-spoke' model, we anticipate utilising a combination of different feedstocks (all of which will meet the eligibility rules) to create a 'basket' of different classifications of SAF, including bio-SAF, RCF-SAF and PtL-SAF. How would a such a project be treated?	Each feedstock will need to meet the LCFF eligibility criteria. And the different consignments arising need separate GHG emission intensity calculations conducted. If you have bio-SAF, RCF-SAF and PtL-SAF, there will be at least 3 different Appendix H workbooks required. Please be clear in your application form and Appendix E the tonnages of each consignment.
18	Can we confirm that your understanding is that projects in which hydrogen is used solely for hydrogenation and under the 10% LHV threshold, that hydrogen is still considered a feedstock and therefore will have its own consignment (and hence own Appendix H generated)?	Under the LCFF, if hydrogen is used for hydrogenation, this will fall under section 4.10 of the SAF Mandate technical guidance, and this hydrogen will be considered a process input (with a CI) and not a feedstock, so it will not form a new consignment. A separate Appendix H is not required. The 10% threshold relating to process input hydrogen (calculated as MJ LHV hydrogen/MJ LHV jet fuel output) is set to ensure that LCFF funding is not supporting large-scale fossil hydrogen production.
19	What are the hydrogen requirements? The LCFF guidance seems to indicate some blue hydrogen may be ok, but the PTL sub-mandate is clear only non-biogenic renewable or nuclear-derived hydrogen sources are permitted, and the wider SAF Mandate only adds biogenic or RCF hydrogen sources?	It is assumed this question refers to intermediate feedstock/fuel hydrogen for SAF production. Eligibility depends on the origin of the hydrogen. If biogenic or RCF, then 100% of the original feedstock must meet the RTFO & SAF Mandate Technical Guidance requirements. If based on feedstock electricity/heat, then at least 90% must meet the PTL eligibility requirements (except for additionality). If based on natural gas reforming with CCS ("blue H2"), the project will be ineligible for LCFF (and the consignment would be ineligible for the SAF Mandate), as it uses a non-waste fossil feedstock. Hydrogen that is only used as a process input (e.g. final upgrading) still needs to meet the LCFF cap on non-waste fossil hydrogen (<10% of jet fuel output by LHV energy).

Ref	Question	Response
20	What is the basis for restricting part-eligible feedstocks?	All feedstocks (and fractions of feedstocks) must meet the eligibility requirements – which depending on the feedstock are either 100% or at least 90% eligibility. DfT are not willing for LCFF funds to be spent on large amounts of ineligible feedstocks that could be purposely mixed with eligible feedstocks, or to be spent on those conversion technologies that rely on consuming large amounts of ineligible feedstocks alongside eligible feedstocks (due to promoting unsustainable feedstocks or locking in high GHG emissions). However, DfT are conscious of the large cost pressures that sourcing 100% renewable feedstock electricity at high load factors places on PTL projects in the near-term (before the grid is fully decarbonised), and so have relaxed this eligibility criteria to 90%.
MATCH FUNDING		
21	The request for match funding - is this match funding for the entire project or match funding for the activities covered under an LCFF funding request? Will the former be rewarded with points during the application?	It is match funding for only those eligible activities proposed for support within the LCFF window 1 funding period. One of the scoring criteria assesses the amount of (evidenced) match funding. However, we note that projects that as part of their application can evidence strong engagement or commitments from investors towards the final investment decision (FID) for the plant are likely to score better on the credibility of the current status of the project and readiness to proceed.
22	Is a “in kind” contribution (e.g. internal development of a FEL package) considered to be match funding? If so, what principles would be used to evaluate the level of that funding?	In kind contributions are recognised as match funding, if these are for eligible activities within your LCFF project scope. In kind contributions for work outside of the LCFF project scope will not be recognised as match funding. In your bid, you should provide the expected in-kind person-days and day rates of each staff member (at the same justifiable rates as for any LCFF funding request), and combine these to estimate the total in-kind match funding that each organisation will provide. A breakdown of this calculation can be provided by adding a tab to Appendix D. Any match funding should be evidenced by board letters, Letters of Intent or signed contracts with contractors/partners.
23	Can match funding be provided - and used - prior to the LCFF making a grant offer? Or after March 2028?	No. Any match funding will need to be evidenced and used within the funding period on eligible activities that are being funded by LCFF.
24	Can match funding commitment be conditional to the project reaching the planned milestones?	Match funding can be conditional based on achievement of set activities/lifecycle stages. You should be very clear which match funding amounts are conditional, and which are unconditional, and their sources (external or internal, cash or in-kind). Note any conditional match funding will be discounted when assessing confirmed match funding.
25	The Example Grant Funding Agreement clause 4.4 says the Grant Recipient must notify DfT of any Match Funding and cannot use this without DfT’s agreement. Would this apply to our own internal resources that will need to be deployed during the project, in case additional resources are required for the project during the funding period?	Yes, this also applies to your own internal resources.

Ref	Question	Response
26	We are obtaining quotes for various project tasks, such as site selection and feedstock studies. If successful, we may fund these tasks from our LCFF budget or use our internal resources to complete them as part of match funding. Can we use the obtained quotes as budget indications for the work to be done as match funding, and if successful, potentially carry out some of the work internally?	If your preferred base case is to obtain quotes and use contractors to carry out these works, use these quotes in your application as to the costs of these activities. If your preferred base case is instead to carry out some of this work internally, you will have to estimate how many days this will take you, and then apply your own internal labour rates, to estimate your own costs for this work (as both your number of days required and rates could differ significantly to your contractors), and use this in your application instead. We would encourage you to only submit one set of base case costs in the tables and Appendices to avoid confusion, but you could describe in text what the impact of the other case is likely to be. Were your project to be successful, this difference could then be used as the basis for a potential Change Request (for DfT to approve/reject) if you wished to change from the base case listed in your Grant Funding Agreement. Note that activities can only be claimed as match funding if they are eligible activities and included within the scope of the proposed project (e.g. deliverables linked to Milestones etc).
27	Does a greater level of match funding score better? For example, would 10% match funding of eligible costs score better than 5% match funding?	Yes, within the one scoring criteria that assesses match funding, a higher level of (evidenced) match funding with be scored preferentially.
28	For application scoring purposes, will the amount of match funding used be the original amount of grant applied for, or the final amount of grant offered by LCFF?	The original amount of grant applied for. If a lower grant offer is made by DfT, this is often due to exclusion/trimming of certain project activities, which may also have match funding associated with them (and which will now be out of scope/not reusable).
29	If we have completed pre-FEED before LCFF award, can we claim match funding for that work?	Any activities completed prior to the start date on your Grant Funding Agreement are ineligible for LCFF funding. All match funding has to be for eligible activities - ineligible activities (including any activities outside of the funding period) cannot be assigned as match funding for eligible activities inside the funding period.
TIMINGS, FUNDING PERIOD		
30	Can we spend money in advance of the project start? There will be a gap between when the AFF Window 3 closed in March 2026 and any LCFF award – can any of this expenditure be covered by LCFF?	No, only eligible costs incurred during the funding period will be paid out of funding allocated under LCFF. As such, any AFF awardee which happens to be successful in LCFF and incurs eligible costs before their LCFF funding period begins will not be able to make claims to cover those costs from funding allocated under a LCFF grant funding agreement.
31	Will activities started before the announcement of LCFF winners be eligible?	Only costs incurred from the date given on a signed Grant Funding Agreement until 31 March 2028 will be eligible to be claimed. It is unlikely that Grant Funding Agreements will be signed before December 2026. Delays in finalising your milestones, stage gates and special conditions will delay signing of your Grant Funding Agreement, so we encourage projects to be as responsive as possible during finalisation of Annex 2 and 7.
32	Can you clarify from when the eligible costs are counted? What happens to this date if the award date is delayed?	Eligible costs are counted from the start date given on your signed Grant Funding Agreement, up to 31 March 2028. Any costs incurred before or after this period are ineligible.
33	FEL-2 activities, particularly those related to further technology testing, could face schedule delays (e.g. due to parts supply, feedstock delays). If these activities were scheduled and paid for within the Funding Window but some work was completed after 31 March 2028, would the LCFF cover the work completed after 31 March 2028, due to unexpected delays?	No, LCFF funds are only distributed in arrears, for expenditure incurred relating to eligible activities that were completed during the LCFF funding window. Work completed after 31 March 2028 is not eligible for funding. Your application needs to consider the likelihood of delays and whether costs will be claimable by 31 March 2028. Furthermore, we note the supply of parts for a testing facility would not be an eligible cost.

Ref	Question	Response
34	During the pre-FEED to FEED bridging phases of the project, we have endeavoured to continue progressing the project in readiness for FEED. As part of this, we have placed some purchase orders but, in some cases, have not yet instructed commencement of the work or incurred the costs. Can we include support for scopes of work on which purchase orders have been placed but costs have not been incurred? In practice, without further funding, we will not be able to instruct or incur further costs on these scopes of work.	Funds can be claimed in arrears against evidence of eligible expenditure for activities, as agreed in your Grant Funding Agreement, that are to be conducted during the funding period. If purchase orders for eligible activities (e.g. FEED design work) have been placed ahead of GOL signing, but the work has not started and the costs of this work have not yet been incurred, then provided that both the work occurs during the funding period and the related expenditure is incurred during the funding period, this expenditure can be eligible. If work has already started ahead of Agreement signing, then only the parts of the work occurring during the funding period will be eligible. Funding also cannot be given for tasks carried out before Agreement signing, even if the expenditure (e.g. invoices) for those tasks occurs after Agreement signing. Evidence of the purchase orders and their acceptance by the contractor/vendor, expected dates for the activity deliverables and the invoice/payment dates, and the status of the instruction to start, should be provided in your application.
35	Can we set interim work milestones that can be demonstrated as completed in order to make a series of Grant Claims, rather than waiting for a much longer period for completion of the full work package?	Yes, the Grant Funding Agreement will set out the milestones for activities and the evidence needed to prove the activities have been completed. This can be split out into multiple milestones and does not need to be a full work package. Grant funding will be paid in arrears after evidence is provided for each milestone. However, we would encourage you to avoid planning for monthly or bi-monthly milestones where possible, to reduce grant administrative and reporting overheads – most projects aim for 2-4 claims a year.
TECHNOLOGY READINESS LEVELS		
36	What would be the minimum size of a small demonstration plant (TRL 6), particularly for the conversion of CO2 into jet?	There is no set minimum size for a TRL 6 small demo plant, and the applicant must evidence that the proposed plant meets the definition of technology demonstration (not just validation) in an industrially relevant environment. While there are indicative size ranges for more common pathways, TRL is not just a function of scale – it incorporates operating regimes & run times, the level of process integration & stream recycles, the setting & staffing, and feedstock & fuel logistics. Compared to ineligible TRL 5 pilot plants, DfT will be looking for evidence of longer run times, reliability testing and performance optimisation, integrated processes with key recycles, an industrial/commercial environment with engineering staff, no use of bottled feedstock gases (for e.g. CO2 and H2), and fuel testing with commercial offtakers or for ASTM qualification from TRL 6 plants. Technology pathways that integrate process units and/or can evidence they will be commercially profitable (TRL 8) at significantly smaller scales than other pathways are likely to have corresponding smaller scales for their TRL 6 or 7 facilities.
37	Page 5 of the LCFF guidance refers to fuel production and the need to produce commercially significant volumes of fuel – can you please clarify what you mean by “significant”?	This would be the at least the tonnage of jet fuel produced by a small demonstration plant (at the minimum TRL 6).

Ref	Question	Response
38	Would the fund support (in theory) a technology which today is at TRL7 and could reach TRL9 once operational i.e. after the LCFF funding period has closed?	We would suggest distinguishing between a technology (which could be developed by multiple actors in various plants globally) and your LCFF project (one application of a technology). A technology being TRL 7 today would meet that part of the TRL eligibility criteria (TRL 5 or greater today). However, the LCFF can only support the development of projects that will be TRL 6-8 once the plant is operational. LCFF cannot support projects that will be TRL 9 (fully commercialised) once operational - for example, if there are dozens of similar plants, using the same technology, in profitable operation globally, either already today or in the next couple of years (ahead of the proposed LCFF plant starting up). Obviously after 20+ years of operations of a LCFF plant, the technology might at that stage have reached TRL 9 through multiple large-scale commercial deployments, but the TRL of your proposed LCFF project is determined at the time of LCFF application, and not recalculated throughout its operational lifetime or at the end of the LCFF funding period (31 March 2028). It is also not a requirement that your plant starts operations during the LCFF funding period.
39	On TRL - do you factor in two different technologies that get combined into a calculation? One element may be TRL9, the other may be TRL 7. How would this be taken into account?	If you have a supply chain with sequential processes, you are likely to have different TRLs for those different components, and we expect these component TRLs to be given and evidenced, as well as for the combined pathway. Generally, the combined pathway TRL will be the lowest common denominator of the components, so TRL 7 in your example. The combined pathway TRL will be used for the TRL eligibility checks. However, if there are two different technologies that get combined into a single reactor/a merged technology is created, this may have a different TRL, and will be judged on its own merits and status of development. The onus is always on the applicant to evidence their TRL and accompanying pilot/demo evidence.
FINANCIAL MODEL, APPENDIX E		
40	If we cannot complete the Appendix E financial model in full, will we be deemed ineligible?	No, the provision of Appendix E is not one of the LCFF eligibility criteria, but marks will be lost if it is not provided or completed in full.
41	Our project will source feedstock from many sources. There are only 3 feedstock rows provided with tonnages and prices in Appendix E. Can add extra rows, or should we aggregate our feedstock purchase cost streams?	Please do add additional feedstock rows if you have more than 3 feedstocks, ensuring you add tonnes/yr, £/tonne pricing and £/yr annual cost formulae. Double-check that the total OPEX formula sums all the relevant rows.
42	Please confirm that for Appendix E we can use a Class 5 cost estimate - which will be further narrowed to Class 4 as part of the Pre-FEED funded activities? Also, would 8-year cashflow projections (3 years of constructions plus 5 years of commercial operations, including ramp-up) be sufficient in the above case?	Yes, please base your LCFF plant costs on the best available estimates today. You should model the full expected operational lifetime of your proposed plant, which in many cases might be 20+ years for a FOAK commercial plant. If only 5 years, please justify how this fits with your plant strategy – e.g. is this only a small demo with certain shorter run-time objectives, or evidence how will your commercial plant repay any debt raised within only 5 years?

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43	Can the SAF price used in the application Appendix E be higher than the SAF Mandate buyout or not?	A typical SAF price value stack in the UK may include the fossil jet A-1 price, the SAF Mandate certificate price * CI multiplier for your fuel, the UK ETS price, plus any other value pool captured from customers, with appropriate discounts applied to each of these for any value retained by downstream parties and not fully passed back to the SAF producer. There is potential RCM support to also factor in. The total jet price (in £/tonne) could be higher than just the SAF Mandate buyout, particularly if the SAF Mandate (or PTL sub-mandate) is short in that year, and the fuel has a large CI multiplier (low GHG emissions). Appendix E will show the likely production costs from the proposed LCFF plant. If a demonstration plant, these costs could be high, well above the maximum willingness-to-pay of a jet fuel supplier or airline. A FOAK commercial plant would be expected to be able to make a profit, where production costs are sufficiently below prices.
44	If CCS is part of the production process - and part of the business model - what evidence is required to confirm CCS arrangements?	Presuming that this refers to CCS sequestration (i.e. a fuel production plant that is generating CO2 then relying on CO2 transport and sequestration), rather than consuming CO2 as an input, there are no minimum evidence requirements. However, we would ask for as much evidence as possible about what CO2 network your project would be connected to and at what location, where the final sequestration site would be, who will be handling that CO2, the status of your contractual arrangements with the network operator, the scales of your CO2 generated and the network size, the likely timings for deployment/roll-out of this CCS network vs your LCFF plant, what happens to your project GHG emissions if there is a CO2 network delay that means no CCS is available in the first full calendar year of operations (Appendix H), and the expected revenues/costs arising from this CCS in each year (Appendix E) with your assumptions and evidence.
GHG EMISSIONS, APPENDIX H		
45	In the guidance document Annex E, how are the PTL eligible grid shares to be used and what GHG intensity do these shares take? These forecasts are a key input into the SAF cashflow model, determining the number of compliance certificates obtained per unit of PTL SAF produced, and hence project revenue generation.	If grid electricity is purchased and used to generate input hydrogen for SAF production, and none of the exceptions listed in 4.40 of the RTFO & SAF Mandate technical guidance apply, then the PTL share of the GB/NI grid will generate a PTL consignment. Under Scenario 1 of Table 4 in the RTFO & SAF Mandate Technical Guidance, this consignment must use the projected annual grid average intensity from Annex E. Nil intensity or a nuclear intensity for this share of the grid electricity cannot be assumed. The increasing PTL grid shares and declining grid intensity in Annex E will mean declining emissions for increasing tonnages of PTL consignments, leading to more SAF Mandate certificates each year. If grid average electricity is purchased and only used to run auxiliary plant processes (not as a feedstock), then the grid electricity will only impact the SAF GHG intensity, and the PTL-eligible grid shares in Annex E are irrelevant. However, as the grid decarbonises this will still mean declining SAF GHG intensity, and more SAF Mandate certificates each year.

Ref	Question	Response
46	How should multiple feedstocks, each with its own CI, and each with its own transport mode (e.g. road vs rail), be calculated in Appendix H?	The whole Appendix H workbook should be replicated for each consignment, and note that all the jet fuel within a consignment must have the same GHG intensity. This will mean separate Excel workbooks for each feedstock-transport mode combination. However, you may use weighted average transport distances for each feedstock-transport mode workbook (e.g. do not use separate workbooks for UK forestry residues trucked 50km vs 100km). Multiple consignments cannot be input into an Appendix H template, so the inputs/outputs in each Appendix H workbook should be pro-rated to only that consignment. Please do not attempt to structurally modify Appendix H or the formulae within it, as this will result in your application losing marks in the GHG emission scoring criteria, or could present eligibility concerns. If following these instructions will require more than 5 Appendix H workbooks for one plant, please contact LCFF@WSP.com at least 2 weeks before the deadline. We will promptly provide you with a bespoke modified Excel to include all your feedstocks of one type (e.g. biomass feedstocks) together on the collection tab, and all the transport modes together on the feedstock transport tab, with pre-approval to use this modified template. Any weighted average result will not meet SAF Mandate reporting requirements once your project is operational, so is only valid for LCFF to simplify the application and assessment process where the need is evidenced, and will only be permitted for feedstock-transport mode combinations that are likely to be comfortably compliant with the LCFF GHG threshold – more marginal consignments should still use a separate Appendix H to demonstrate their eligibility. Different consignment GHG intensities will generate different numbers of SAF mandate certificates, so ensure fuel values given in the Appendix E workbook reflect this.
47	The project will be using a liquid biogenic intermediate as some of its feedstock, with sustainability certification and a CI available for each delivered liquid intermediate, from multiple suppliers. No LCFF funding will be requested regarding the upstream production/delivery of the liquid intermediate. Given the large number of supply chain steps we have in converting the liquid intermediate to delivered LCFF eligible fuels, can we start our Appendix H workbook at the point of collection of the liquid intermediate, to not run out of steps in the workbook?	The number of suppliers or your commercial/investment scope does not determine the scope of your Appendix H. Please read the instructions in Application form section 3.4.1 as to whether full input/output data is required for the upstream supply chain steps, or whether a delivered liquid intermediate GHG intensity may be used. If you need further supply chain worksheets to be added to the Appendix H template, please either: - merge step data to fit within the template (e.g. putting the inputs/outputs from several similar storage & transport steps together in one worksheet, ideally where there several steps with no/minimal losses, and clearly mark on the System Boundary worksheet which steps have been merged); or - email LCFF@WSP.com to request which steps you need added to the template, and a bespoke template can be provided to you, with DfT pre-approval to use this. Please do not try to structurally modify either the main template or bespoke template yourself, or formulae, as this will result in your application losing marks in the GHG scoring criteria, or could present eligibility concerns.

Ref	Question	Response
48	We intend to use site-specific GHG intensities for utilities such as hydrogen or steam. This is intended to give a better real-world snapshot of future operation. These will be clearly listed and noted how they deviate from UK SAF Mandate Standard Data references. Is this ok for the application?	Yes, this is permissible, as use of the SAF Mandate Standard Data workbook is recommended but not obligatory. Note that steam is not given in the SAF Mandate Standard Data workbook, so site-specific data should be reported and referenced/evidenced anyway. The SAF Mandate Standard Data workbook only gives hydrogen production intensities for 3 likely pathways, but these values do not include any transport or storage of the hydrogen to the LCFF project. Please make clear the production pathway, feedstock intensity, efficiency (and any CO ₂ capture if relevant), transport and storage that is assumed for the delivered hydrogen intensity you use. Please also bear in mind the LCFF eligibility rules for hydrogen.
49	In Appendix H, for the GHG Intensity of inputs, for example diesel, is this the GHG Intensity of getting this diesel to the trucks before it has been burned?	When completing Appendix H for a transport step, you should ideally list e.g. diesel as an input and give the GHG intensity in that row as only the upstream production & supply (Scope 3) emissions for the diesel to the point of refuelling into a truck. Then, in the outputs section of that same step, separately list the fossil CO ₂ , CH ₄ , N ₂ O emissions from combustion of the diesel. Alternatively, you may list diesel as an input and give the GHG intensity in that input row as the combined GHG emissions of combustion plus upstream production & supply emissions, and do not provide emissions from fossil diesel combustion in the step output table. In either case, do not double-count emissions in the step, but do not omit emissions either, and make your assumptions and references clear in the relevant rows.
50	For woody biomass, if on a net basis the carbon emissions released from the produced fuel is 0 as this feedstock is biogenic. Should we show this on a -ve / +ve basis for the feedstock and fuel summing to 0, or is it acceptable to put 0 against both the feedstock and fuel for GHG intensity?	Following the RTFO & SAF Mandate GHG methodology, there is no credit for biomass feedstocks' absorption of atmospheric CO ₂ (and note all LCFF eligible feedstocks are residues/wastes, so not are not grown/this drawdown would not be applicable in any event). Similarly, there is no GWP penalty for biofuel combustion into the atmosphere, as "emissions from the fuel in use" for biofuels are taken to be zero.
51	Our pathway prevents MSW & RDF waste from being burned in energy-from-waste plants that would emit ~1 tonne of CO ₂ e for every tonne of waste burned. Can we count this as avoided emissions for the feedstock, as under EU RED?	No, the UK RTFO & SAF Mandate Technical Guidance must be followed. Your fuel will have a biofuel consignment and a RCF consignment, which have separate GHG methodologies. Only the fossil fraction of MSW/RDF has a displaced counterfactual emission term, which is a grid CI penalty based on the loss of electricity generation. There are no credits given for avoided fossil CO ₂ from incineration/EfW plants, but equally, there are no penalties given for release of feedstock fossil CO ₂ during processing or when the RCF jet consignment is ultimately combusted.
52	The eligibility mentions the CI for a FOAK plant must be < 31 gCO ₂ e/MJ LHV, not the SAF mandate threshold of 53.4 gCO ₂ e/MJ. Could the reason for this be explained?	Firstly, DfT wish to ensure that plants supported by the LCFF are resilient and can operate for 20-30 years without likely SAF Mandate emissions threshold concerns. Secondly, DfT wish to promote innovation and high GHG saving projects, and make sure that the maximum amount of GHG savings can be delivered for the amount of public money available. Third, a high GHG emission threshold in the LCFF could mean high GHG emission projects get funded that are then locked in for decades presenting challenges to UK carbon budgets - given the LCFF is a one-off eligibility criteria to be passed, and cannot be tightened over time like the SAF Mandate GHG thresholds can. Finally, the 31gCO ₂ e/MJ LHV threshold is consistent with the prior AFF competition.
53	If as part of the study we will explore further the full GHG calculation through an LCA, is it necessary to fill in Appendix H at submission point? What if we are unable to fill in Appendix H fully?	Estimated GHG emissions are required for application eligibility. Appendix H will need to be completed sufficiently to provide enough confidence that the LCFF GHG emissions threshold can likely be met. If there are gaps in your Appendix H, you may lose some marks, or have clarifications questions/eligibility flags raised, depending on how serious the gaps are. If Appendix H is empty, your application will be ineligible. Given the Feasibility phase is ineligible, you should already have an initial GHG emissions estimate to start Pre-FEED. Further refinement of your GHG emissions calculation is permitted during Pre-FEED/FEED.

Ref	Question	Response
PROJECT LIFECYCLE STAGES		
54	Would pre-FEED be considered as definition up to Class 4 with FEED providing definition up to Class 3?	Completion of a Class 4 cost estimate is the correct definition between pre-FEED stopping and FEED starting. FEED ends at the Final Investment Decision being taken, not completion of a Class 3 cost estimate.
55	You mentioned pre-FEED stage is classed as AACE Class 4 estimate. Can you confirm this? This is usually considered feasibility level.	Following Annex C of the LCFF guidance document, provision of an AACE Class 5 cost estimate for the chosen pathway is deemed to complete Feasibility, Class 4 is deemed to complete the LCFF pre-FEED stage. The LCFF FEED stage is deemed to end at the point of Final Investment Decision being taken (and the expectation is that an AACE Class 3 or 2 cost estimate will have occurred within FEED).
56	Feasibility studies have been classified as ineligible for funding. Would a project be eligible if it targets a combined feasibility and pre-FEED study? And if the project is eligible in this scenario, would the funding cover the full combined package or only the pre-FEED element?	The project will only be partly eligible, and LCFF funding could only cover the pre-FEED element. Note that the Feasibility stage ends at the date of the completion of an AACE Class 5 cost estimate, and the (eligible) Pre-FEED stage immediately starts at the same date.
57	What evidence does DfT need to see to demonstrate that the feasibility study has been done? Do you need to see the entire study in either Appendix B or Appendix I?	If the full Feasibility study (i.e. AACE Class 5 cost estimate) is available to be shared, it can be attached in Appendix B or Appendix I (and cross-referenced). If not available to be shared, DfT will need to see evidence as to the work being completed (e.g. contractor invoices paid, showing delivery and acceptance of the Class 5 cost estimate), along with signed statements from the contractor and applicant that a Class 5 cost estimate has been completed.
58	Do you need to evidence a Class 5 estimate and all other documents at the submission deadline, or can we provide later before the funding decision i.e. at some point during the due diligence process?	The more evidence that can be provided in the application stage the better for your score, and evidence of already completing a Class 5 cost estimate would allow assessors to state your project has already entered pre-FEED. However, a project could still be months away from completing their Class 5 cost estimate. We would still encourage an application to be made, but note that the project can only apply for funding from the point of completion of the Class 5 estimate/start of the pre-FEED. The application should clearly state the expected date for completing Feasibility, and current status of the Class 5 cost estimate. Should the project be selected for funding, it is likely a starting Stage Gate would be imposed in the Grant Funding Agreement, where completion of the Class 5 cost estimate would have to be evidenced before any access to LCFF funding could start.
59	Please confirm that projects can apply for partial outcomes of a project lifecycle? E.g. if a project cannot complete all outcomes of a 'FEED' by 31 March 2028 can the project apply for the portion of activities that will be completed by this date? What level of definition is appropriate to demonstrate completion of the scope within the funding window?	Applicants can apply for funding towards eligible activities to be completed within the funding window, this does not have to be a full pre-FEED or FEED study. The Grant Funding Agreement will set out the milestones for activities and the evidence needed to prove the activities have been completed. Grant funding will be paid in arrears after this evidence is provided. LCFF window 1 funding will not be extended beyond 31 March 2028.
60	If the project is at the pre-FEED stage, what evidence of investor engagement is required in respect of the subsequent (FEED) stage?	There are no minimum investor requirements within the LCFF at pre-FEED stage or when entering FEED, but projects that can evidence more advanced discussions (memorandum of understanding, heads of terms, draft agreements, signed agreements) will have stronger evidence and score better on some of the relevant scoring criteria, including current status of the project and readiness to proceed.
61	What evidence of feedstock procurement arrangements (including volumes and target prices) is sufficient/acceptable for the pre-FEED stage?	There are no minimum requirements, but evidence of MOUs, HoTs or feedstock supply agreements (FSAs) will be evaluated, along with the level of detail in these arrangements, and this evidence will contribute towards the scoring of projects in demonstrating their readiness to proceed with funded activities. DfT would expect signed FSAs if taking FID, but the pre-FEED stage is significantly earlier in the project development.

Ref	Question	Response
62	As part of pre-FEED scope, can we deep-evaluate several technology options for a specific production process, and then proceed with the final selection?	Feasibility (not eligible for the LCFF) is usually the stage at which you conduct technology screening and choose between various different technology pathways. Pre-FEED is normally the stage at which you appraise and choose between different technology configurations, preferred technology providers, utilities provision, system boundaries (onsite vs over-the-fence inputs). For Pre-FEED eligibility to begin, you will need to evidence the completion of a Class 5 cost estimate for your chosen technology pathway.
63	In respect of pre-FEED, plant site requirements are defined as "specific location has been identified". As part of the scope, can we (a) assess several locations, and (b) progress pre-FEED with two locations for risk mitigation purposes?	In Annex C of the LCFF guidance document, under Pre-FEED, the text "A specific location for the plant will have been identified" is the expected outcome of Pre-FEED, not the start. It is likely that different sites will need to be assessed for your LCFF project, and "plant site identification and review" work is eligible. Pre-FEED engineering may not be site-specific and resulting costs could be applicable across several sites, given the wider error margins than for FEED studies (which will be site and configuration specific). It would be relatively unusual to have two sites being developed with similar pre-FEED studies at the same time, in the knowledge one of the sites will definitely be dropped - although this is not impossible, and would be up the applicant to evidence why this optionality would be a good use of LCFF funds. Please clearly demarcate the costs, scales and emissions of the two different sites. The applicant should also clearly show what the added costs are of one site versus the other, to evidence how you can reduce or avoid duplication of costs. Alternatively, if one of the sites will not be dropped, and you are asking for LCFF funding for both sites for two similar projects (e.g. two FOAK plants), we would encourage you to submit two separate applications.
COST ELIGIBILITY		
64	We assume that in clause 5.2 the use of the term "reimbursement basis" is not actually requiring the Grant Recipient to pay the Supplier before grant is claimed?	Grant payments are paid in arrears after evidence of costs incurred have been provided. Evidence for costs incurred will be invoices from suppliers. We do not need evidence that the invoice has been paid.
65	Is a site selection exercise eligible under this LCFF grant? We are looking to assess and secure the best, most cost-effective site for our project.	Yes, if completion of the Feasibility study is evidenced, site selection work can fall under pre-FEED activities.

Ref	Question	Response
66	We have carried out Feasibility and some pre-FEED work for a UK project. Some parts of the technology value chain require deeper evaluation. There are two potential non-UK suppliers whose technology we would like to evaluate and test – they have existing overseas pilot plants, and are setting up overseas demo plants. What would be eligible under LCFF? And what if we provided match funding in the form of travel costs, and participation in testing and results review?	The LCFF plant for which funding is requested must be located in the UK. If as part of this UK project's engineering work (e.g. pre-FEED or FEED), there is a requirement to conduct <u>some</u> additional testing (e.g. to improve heat & mass balance accuracies, test new feedstocks etc), this testing can happen in an <u>existing</u> overseas pilot/demo facility, but is limited to testing necessary for the development of the UK project (and this must be evidenced) and cannot be the majority of the LCFF funding requested. Any set-up costs (e.g. construction, commissioning) for an overseas plant is also not eligible. Please be very clear in your application where (UK vs overseas) and how LCFF funds would be spent, and evidence the need to carry out testing of two separate suppliers and how duplication of effort is avoided. Note that LCFF project partners or subcontractors do not need to be based in the UK, but the economic benefits section of your application should also make clear the distinction between UK vs overseas benefits arising from your project. For the UK project, results review would be eligible. Participation in testing is subject to the points above. Travel would only be eligible if it was evidenced as necessary for the eligible activities, particularly if regularly overseas. Travel costs should be separated out in your bid and be shown to be appropriate. You can choose to nominate certain eligible activities as being fully match funded, but these eligible activities must be included within the project scope for the associated match funding to count.
67	The project intends to leverage existing offsite storage tanks and pipeline infrastructure in the UK. Can we include support for engineering and consulting costs associated with developing this in our application (in addition to onsite infrastructure at the SAF plant)?	Engineering and consulting costs associated with developing offsite tanks & pipes is unlikely to be eligible due to TRL eligibility criteria for that project within the supply chain, if storage tanks and pipes are fully commercialised technologies for the materials being handled, e.g. precursors or jet. You should make clear the separate costs and TRLs associated with the assets in the different locations, in case DfT determine parts of the supply chain are not eligible. The full list of criteria in response to Question 1 would also apply tanks & pipes.
68	It is concerning that we need to get 3 competitive quotes for expenditure >£5,000 which may take a considerable amount of time. It is also concerning that some suppliers seek upfront fees to even provide a quote. For each contract we wish to enter, can we provide a list of the companies that we wish to seek quotations from and for a particular contract an explanation why fewer than 3 will be invited?	For any partner or consortium member of the lead applicant there will not be a need to seek three quotations for their scope of work. The three-quote requirement for procurement activity applies for subcontractors during the funding period. You will need to provide evidence of expected costs as part of the application and these costs will be scrutinised as part of the assessment, as much information on the expected costs should be provided as part of the application including your list of preferred subcontractors. DfT recognise that it is not always possible to get 3 quotes for all contracts and it is the responsibility of the Grant Recipient to provide explanation where this is the case and to ensure that value for money has been considered.
69	If a project has been unable to commence activities proposed in AFF windows 1-3 due to lack of funding, rather than failing to deliver, are these activities now ineligible for LCFF funding?	Each LCFF application will be assessed in isolation, and no eligible activities will be excluded from consideration, provided they have not been previously claimed for. As listed in the LCFF guidance document, credibility of the current status of the project and readiness to proceed with funded activities is one of the scoring criteria, so evidence should be provided of your project's situation.
70	Are legal costs for commercial due diligence covered under “addressing legal issues”?	Yes, if this due diligence is occurring during the funding window for other investors. Any legal costs incurred during DfT due diligence will be before Grant Funding Agreements are signed, so are not eligible.
71	Are borrower's legal advice and lender's legal advice during debt financing covered in “addressing legal issues”?	The project's legal advice costs during debt financing are eligible costs. The lender's legal advice costs during debt financing are not eligible, unless the lender is a project partner within the LCFF application.
72	Is funding able to be used for studies with utilities (e.g. water, grid connection, CO2 export, etc) as part of Pre-FEED/FEED?	Yes.

Ref	Question	Response
73	During the LCFF evaluation period (and whilst not removing the responsibility of the Company to ensure compliance), will LCFF provide some advance reassurance concerning our scope of works proposed and estimated associated costs, to highlight areas where there be concern as to eligibility, or caution needs to be applied?	Decisions regarding eligibility of activities and costs (or of your whole application) will only be communicated once project funding allocations are made by DfT and feedback letters are sent out to all applicants. However, you may be asked clarification questions in the interim period regarding the details of certain activities or costs to help us ascertain eligibility (that would give you some limited steer), or the impact of removing certain activities or costs due to portfolio funding pressures (that would also give you some limited steer). There are however no guarantees that these types of clarification questions will be asked, as your application could be accepted as is, or rejected outright. Specific questions about the eligibility of certain activities or costs can be raised with the LCFF@WSP.com inbox ahead of the deadline, but we cannot review a planned programme of works or detailed project budget to provide any pre-approvals. This includes during the voluntary indicative eligibility pre-check.
74	Could you please confirm whether training related to the LCFF project would be considered an eligible cost, e.g. health and safety?	Health & safety training (for the proposed project team) may be eligible if this training can be evidenced as being necessary to carry out proposed eligible activities (e.g. prior to site visits for plant site identification work). General training not specifically related to the proposed LCFF plant is not eligible (e.g. for career progression purposes or annual CPD requirements). Note that health & safety assessments, HAZOP, HAZIP workshops etc, for the planned LCFF plant are eligible.
75	Would fuel testing costs incurred during pre-FEED/FEED be considered an eligible cost?	Fuel testing costs relating to your proposed plant's feedstock & pathway would be eligible.
76	If an application includes an item that is neither explicitly listed as eligible nor ineligible, can you confirm that this would not render the entire LCFF project application ineligible, but rather that the specific cost would simply be excluded from the eligible project costs if the application were to be successful?	Correct, provided this is a modest share of the total costs, or other important activities are not contingent on this item. Larger concerns regarding your application would be raised if this item were deemed ineligible and was a significant share or majority of the funds being applied for, or other important activities were contingent on this. We would strongly encourage you to enquire with LCFF@WSP.com well ahead of the deadline if the eligibility of an item is uncertain or is not listed. This would allow you to include/exclude this item from your bid, and maximise the likelihood that your whole application will be deemed eligible. If the item is included but deemed ineligible, it may present challenges in how your application is assessed (e.g. clarification questions may need raised about the impact on timelines, costs, risks, overall project objectives etc of removing the item).
77	Could you say what is a "reasonable" level of overhead recovery (as we note contingencies are not eligible costs)?	DfT consider up to 40% of direct salaries to be a reasonable % of overhead costs.
78	Are market making initiatives eligible costs? We are developing a membership and net zero commitment as part of our demand development, which we see compliments the project design and build.	Advertising, marketing, and sales activities are not eligible activities. Generic membership activities or wider industry net zero commitment activities will not be eligible, nor will policy lobbying activities. Negotiating off-takes, hosting meetings with potential consortia members (for the project), formalising a consortium or partnership arrangement (for the project), or hosting of meetings between applicant consortia and others necessary to further the development of the project would be eligible activities.
79	We have already placed an order for a long lead item for which grant funding may be sought - is this OK?	By a long-lead item, we presume you mean a piece of capital equipment, under the Procurement of Equipment lifecycle stage. This is not eligible for LCFF funding.
80	Securing the site for the plant location is critical for site-specific engineering work, with pre-FEED and FEED. Is the cost of an option to acquire the site an eligible expense?	No, purchase or lease costs of any land on which the project is built are ineligible. Options to secure the site, such as land reservation fees or land exclusivity fees, are also ineligible.

Ref	Question	Response
81	Are physical ground investigation works (bore holes) carried out for a site as part of pre-FEED activities eligible under the grant?	Provided these bore holes are evidenced as being necessary for eligible activities during pre-FEED (e.g. permitting or planning application work or site identification review work), they will be eligible. Note that any bore holes required for site building works, construction, land remediation as part of the site works will not be eligible.
82	Technology license fees during the EPC stage are ineligible. Please confirm that technology license fees as part of Pre-FEED/FEED are eligible? Please also confirm if the cost of completing a parallel technology PDP competition is eligible?	Yes, technology licence fees as part of completing a PDP during the pre-FEED and FEED stages are eligible. Tendering costs are also eligible.
83	Does venture debt from a public financial institution (PFI) count towards subsidy cumulation?	Usually no, not if the venture debt is genuinely provided on market terms. If the PFI's venture debt does not constitute a subsidy under the four-limbed test in the Subsidy Control Act 2022, it would not count towards subsidy cumulation. However, if the venture debt contains a concessional element (for example below-market pricing, preferential risk allocation, guarantees, or other advantages that a commercial lender would not offer), the subsidy element may need to be treated as a subsidy and considered for cumulation purposes. Even if the venture debt is ultimately concluded not to be a subsidy, obtaining a declaration is prudent because it assists the due diligence assessment and demonstrates reasonable steps to identify potential cumulation risks.
LEAD APPLICANT, PARTNERS		
84	We intend to set-up a Special Purpose Vehicle (SPV) for the project and asset. Subsequent contracts (including with the FEED contractor) will be with the SPV. If we are successful, will claims showing transactions / disbursements from our organisation-to SPV-to FEED contractor be acceptable? Or would it be better for us to apply for funding via the newly formed SPV, noting it will have no financial history?	Any company that is a registered UK company or charity is eligible to apply for funding, regardless of its date of establishment. DfT will need to carry out due diligence against the company and any parent companies as well as the project partners and it is highly likely that this will involve further clarification questions on their status should this be a newly formed company. In this scenario, this would be acceptable on the assumption that the SPV would still be within the same Group, who would be subject to the due diligence process.
85	The project is applying with its current UK legal entity but if successful will like to open a separate UK SPV company that would deliver the grant activities. Is it permissible to change the legal entity that signs the grant agreement between the application and winning?	A future reassignment/change in the lead applicant is technically possible under clause 21 of the Grant Funding Agreement, with DfT's consent. In your application form, please provide company and governance information regarding both the current lead applicant and the potential other entity (or entities) that might take over in the future, and the relationship(s) between them. DfT need to be able to conduct due diligence on any organisation that is being considered for LCFF funding.
86	Can suppliers and contractors - e.g., a FEED contractor or technology provider - be a consortium partner? If so, will the requirement of evidencing at least three competitive quotes be applied to those parties' eligible cost (e.g. for FEED or process design packages)?	Yes, a FEED contractor or technology provider can be a consortium partner. The requirement to obtain three competitive quotes does not apply to consortium partners.
87	Will there be a networking opportunity dedicated to this call? We are keen to meet partners who can use our biogenic gases in their processes.	In previous competitions, we have allowed potential applicants to provide their details for inclusion on the website. If you would like to do this, and are comfortable for your email address to be publicly available via the LCFF website to enable others to contact you, please email LCFF@WSP.com with your organisation name, email address, and a summary of your offering.

Ref	Question	Response
88	We plan to add 2 service firms who would get paid in the project, but we do not have letter of supports from them as they are not in the consortium. How should we report this?	List them as potential subcontractors in Section 1 of your application form, and evidence what level of engagement has occurred to date in Appendix I.
89	My understanding is that a pilot project must be completed to apply for the grant – can that be carried out by a partner outside of the UK?	Yes, the already completed pilot does not need to be in the UK to be able to evidence your technology is already at TRL5 today.
90	Can the designer for FEED sit outside the UK, providing plant is to be built in UK?	The lead applicant must be a UK registered company or charity. The proposed plant must be located in the UK. Partners or subcontractors do not need to be based in the UK.
APPLICATION AND ASSESSMENT PROCESSES		
91	What is the maximum file size that the email address LCFF@WSP.com can accept for incoming emails, including all attachments? Are there any specific restrictions or limitations on the types of attachments that can be received?	There are no restrictions on file types, although we are only expecting to receive documents in Word, Excel and PDF formats. If you are concerned about the file size, we can offer a secure SharePoint area for you to upload documents to, for us access. Alternatively, you can set up a secure SharePoint area and give us access to that for us to download the documents. We would recommend that if you are concerned about large file sizes, you contact us well in advance of the deadline date so that we can work with you to take receipt of your application.
92	We understand that supporting technical information for the proposed plant should be provided in Appendix B as a single combined PDF. We have over 500 P&IDs and 100 PFDs, so compiling a single PDF is impossible. Should we provide only the PFDs, with the P&IDs available upon request?	You could list all 500 P&IDs and 100 PFDs, and attach the most relevant 10 for each to evidence the work done on all the main components (assuming each are only a few pages), include a statement from the lead applicant and organisation that carried out the PFDs and P&IDs that they all have already been completed to the same quality, and leave the rest as available on request.
93	You mention to separate key info for demo and FOAK plants out – does this need to still within the same word count? Even where tables for input are being duplicated?	Words/numbers within tables will not be counted towards word counts, so please do duplicate tables as required. More flexibility regarding word counts will be given in cases where your application covers both demo and FOAK plants.
94	Some items ideally could be sent as alternative formats: - Declarations: Instead of Word, could they be sent as PDF since they are signed documents? - Appendices: may we send supporting documents as Excel files (i.e. internal illustrative calculations)?	Please send the full application form in Word, including the signed declarations. If you would like to send the signed declarations in PDF format separately this is acceptable. It is fine to send some supporting documents as Excel files if this is more appropriate. Please ensure all file names include the Appendix to which they relate.
95	What kind of information could be requested during the clarification stage and when would we expect these questions to be asked?	You may get different types of questions at different points in the process. In the first few days you may get questions around eligibility. In the first fortnight, you may get questions about inconsistencies or unclear materials. In the following weeks, you are more likely to receive more detailed questions, how different parts of your process or supply chain fit together (e.g. if you have two plants within an application), technical and project scheduling questions. By the Expert Panel and Programme Board, you may get questions on risks, and the impacts of cutting parts of your application or funding request, or setting stage gates. We would ask that you are responsive throughout the assessment process as the types of questions you may get could vary across the weeks.

Ref	Question	Response
96	The guidance outlines 15 different scoring criteria groupings and states that a total score will be allocated to an application by applying a weighting to each of these scoring criteria – can you please share these respective weightings so that applicants can fully understand the assessment process?	DfT will not be sharing the individual scoring criterion weightings, in order to maintain the incentive for applicants to focus on providing complete answers to each question asked. These individual scoring criterion weightings have not been shared in any previous DfT competitions. However, we have provided scoring criteria group weightings in the LCFF guidance document Table 2.
97	Will this grant prioritise advanced SAF projects in which the FID is delayed due to delays in the availability of the RCM?	As per the LCFF guidance document, one of the objectives is to support projects that are closest to commercial scale FID. Projects able to evidence the viability & bankability of the project without reliance on the RCM (e.g. strong offtake pricing) will also score well on the commercial approach scoring criteria.
98	Does the "export" criteria for application scoring mean ability to replicate the plant overseas? Will specific plans in that respect increase scoring in respect of that criteria?	Yes, one of the scoring criteria asks about the realistic potential for future commercial deployment within the UK and overseas, and the benefits of this roll-out. This could be replicating the plant, or deployment of larger (or smaller) plants using the same technology. Indications of countries, scales and start-up years would be beneficial.
99	In the guidance document page 11, there is a requirement stating: <i>"Relevant documentation to enable the completion of due diligence on the applicant(s)." Could you provide further details of what specific documentation is required?</i>	To undertake due diligence, DfT will require information such as Companies House information (e.g., registration number, registered address, latest accounts), confirmation of the identities of the Directors/Trustees/Persons of Significant Control/Named person on application form (for all consortium/alliance/partnership members), information related to other grants awards, conflicts of interest, links to any company websites, etc.
CONFIDENTIALITY & IP		
100	Regarding the LCFF application form section 6.3 on Data Protection, would we be consulted before any commercially sensitive information is intended to be released, and can we object to the release? Does this also apply to third parties' information?	DfT respect that projects are handling sensitive IP and financial information and we have strict confidentiality practices in place. Any information shared by the project in the application is only for the purpose of assessments. Should we receive a Freedom of Information or Environmental Information Regulations request relating to any material that you have provided, we will consult with you to seek your views on disclosure. We will consider your views before making any decision on disclosure, but we cannot unequivocally guarantee that the information will not be released, particularly if DfT are compelled to do so by the Information Commissioner's Office as a result of any appeal made to them. Should any information provided be confidential, this should be marked as strictly confidential.
101	We are in discussions with a potential technology licensor regarding the data we intend to share with you for the LCFF bid. They have informed us that an NDA will be required between DfT and them. Would this be possible?	As all Civil Servants are bound by the Civil Service Code, DfT deem it unnecessary to enter into an NDA in these circumstances. It should also be noted that DfT have a confidentiality agreement in place with delivery partners which covers all information provided to and handled by them as part of the LCFF scheme.
102	The LCFF guidance states IP developed within the project remains the property of the applicant/consortium. However, the Example Grant Funding Agreement says that IPR "in the course of undertaking the Funded Activities are the property of the Authority". Would the IP developed under the Funded Activities belong to DfT or the grantee?	The Grant Funding Agreement conditions state that IP contained within the progress reports will reside with DfT, not the much wider IP generated by the project itself. DfT respect that projects are handling sensitive IP and we have strict confidentiality practices in place. Any information shared by the project in the reports is only for the purpose of monitoring and reporting progress of the project, including unlocking milestone payments. Should any information provided with the progress reports (including final report) be confidential, this should be supplied as a separate annex and marked as strictly confidential.

Ref	Question	Response
103	Consider a SAF pathway in which qualifying biomethane is converted to syngas by steam methane reforming and the resulting fuel meets all SAF Mandate requirements. Because steam methane reforming is endothermic, some reformer heat ultimately increases the chemical energy of the syngas. If that heat is supplied by the same qualifying biomethane used as feedstock, does the LCFF regard it as “feedstock heat” subject to the 90% non-biogenic requirement? If so, does that mean a pathway that is fully eligible under the SAF Mandate could nevertheless be ineligible for LCFF support solely because renewable biogenic heat is used in the reformer?	The feedstock is the material that crosses the plant system boundary (the biomethane) - the feedstock eligibility rules for feedstock electricity/heat only apply if the plant is importing feedstock electricity/heat (and do not apply if generating electricity/heat onsite). In this case, there is only feedstock biomethane, so please follow the biomass eligibility rules.
104	Is agricultural waste, such as silage wrap considered an eligible feedstock for this fund?	Please refer to the current RTFO & SAF Mandate list of feedstocks. Silage wrap appears to be a separately collected waste plastic stream (not part of mixed MSW), and is currently not on the RCF feedstock list, so would not be eligible - nor is any separated waste plastic stream currently on the RCF feedstock list. You would have to seek addition to the eligible RCF feedstock list from DfT's Low Carbon Fuels Delivery Unit before the full application is submitted. Alternatively, the project could submit evidence in the full application and then if successful in the LCFF, the start of any award would likely be contingent on the new feedstock being approved as eligible (a starting stage gate) - with the risk this approval may not materialise/the project may not be able to start.
105	The technical eligibility criteria for PtL / electricity feedstock state that electricity must meet the PTL requirements of the SAF Mandate, except for the additionality rules. Could you shed some light on why additionality rules are excluded? This seems to be an inconsistency between the LCFF and the SAF Mandate?	DfT require funded projects, when operational, to meet the SAF Mandate, therefore additionality could be required (depending on the electricity source used). For the purposes of the Low Carbon Fuels Fund, it is difficult to evidence additionality years in advance of operations, plus most projects will not have signed power purchase agreements yet. This LCFF decision not to assess additionality is therefore purely practical, and not a change in DfT policy.
106	Please define Overhead Costs? This is not listed in the current guidelines.	Overhead costs are ongoing business expenses required to sustain a business that cannot be directly linked to the goods or services provided. Common examples of overhead costs would be rent, utilities, administration salaries, office supplies, etc.
107	Can the LCFF grant funding be used to cover land option fees for securing a project site?	No. Purchase or lease cost of any land or reservation fees are ineligible.
108	Noting the split of funding (£30M for the period to March 2027, which is realistically about 2.5 months from GOL receipt, so about £12M per month, £63M for the following year, £5.25M per month), are applicants obliged to request grants in the same proportions year to year? (It is unlikely to match the natural spend profile, so to do so would introduce inefficiency, but applicants would not want to be disadvantaged by not doing so).	We would recommend you follow your natural project spend and request what is required. You do not have to follow the proportional split between the LCFF funding years.

109	Are technology license fees permitted as eligible spend during the FEED phase? How about during Detailed Engineering?	Technology license fees are eligible during Pre-FEED or FEED stages. Once you have taken a Final Investment Decision (FID), EPC licence fees are not eligible. This is because EPC licence fees can often be very large lump sums, and it is assumed that the project would have secured enough equity and debt at FID to have fully funded those lump sums.
110	Will an applicant's track record in delivering previously funded projects under the AFF grant windows, including performance against deadlines and milestones, control of budgeted expenditure, and feedback from monitoring officers, form part of the assessment basis for the current LCFF window and inform the final funding recommendation?	It is not a prerequisite to have been successful under AFF to apply for the LCFF. Each LCFF application will be assessed based on the application materials submitted. Assessors will not be conducting interviews with previous AFF monitoring offers or collecting feedback from DfT. You can of course provide evidence of how your project has progressed during AFF to show that your project is ready to proceed as part of your application, and list this as part of your team's recent experience. Equally, if you were not supported during AFF, you must evidence where your project has progressed to when you apply, and your team's relevant experience.
111	Is there any independent assessment of feasibility, investability, bankability of projects?	Appendix E is asking projects to provide their plant financial model. This will demonstrate the sources of the debt and equity, and profile for the plant construction and operations. This will be assessed by the delivery partners and will be reviewed by DfT. There will be independent financial experts as part of the Expert Panel, as well as DfT commercial colleagues on the Programme Board.
112	The "commercial approach" evaluation criteria number 6 ("Level of progression towards a Final Investment Decision for a FOAK commercial plant as a result of the funded activities") - what about demo plants?	As specified in Question 4.1.1 of the application form, if your project is developing a demonstration plant, please set out a clear timeline for when that demonstration plant will close its funding, when it will be constructed, and when it will be operating. Please also set out timelines for your future FOAK commercial plant development, FID, construction and start of operations. Unless there is an integrated operating pilot plant that continues to provide strong validated data for scale-up, DfT will typically expect to see some learnings from the demo plant early operations feed back into the FOAK commercial plant engineering design, but the amount of demo/FOAK programme overlap will depend on the technology pathway, risks, team expertise etc.
113	Will information provided in the LCFF application (e.g. the applicants' assumed RCM strike prices in the Financial Model) be used for any other purposes by DfT (e.g. in future RCM negotiations)? Is success in LCFF intended to be an eligibility criterion for a future RCM allocation?	DfT may use information provided in applications for internal information and modelling. No information will be shared for RCM negotiation purposes. Success in the LCFF is not a prerequisite for success in any RCM allocation - they are entirely separate schemes.
114	How should we think about showing FID dates for projects given the recent timeline shared by DfT for the RCM application process i.e. downselect of selected projects by end of 2027 and bilateral agreements negotiated by end of 2028. There could be an FID if a project does not go for or need RCM (if they have definitive offtakes) but given all projects and all offtakers will expect an RCM application to be ideal, should we show two potential FID dates and timelines to startup?	We would encourage projects to show their expected base case business model. If you expect to have definitive offtakes secured and the ability to take an FID in the next year or so, before any RCM agreement is available, then state this as your base case in the application. Then say as an alternative case you would rely on the RCM which would delay your timings by X. Conversely, if your base case is to rely on the RCM, but there is a potential upside that you may be able to go faster if you manage to secure offtakes earlier (and the other contracts required to reach FID), we would recommend adding this information to your application as an upside to your RCM-aligned timings base case.
115	AFF Window 3 had partial awards, due to the shorter funding period. Are partial awards a possibility with this LCFF round if it's oversubscribed?	Based on past grant funding competition experience, we expect the first LCFF application Window to be oversubscribed. Projects must be of a high enough quality to meet all eligibility criteria and score above the minimum score requirement to be considered for potential funding. Funding will be allocated on a portfolio basis,

		considering the factors stated in the LCFF Guidance Document. As stated on page 14, it is possible that successful projects may be awarded less funding than requested in their application (with projects then having to provide more match funding or trim their programme), or that full funding might be awarded for only a part of their application (e.g. one of two proposed plants, or only a certain lifecycle stage, etc).
116	Feedstock consignments: If a project has multiple sources of methanol feedstock, should a separate Appendix H be completed for each consignment? Is there an upper limit to the number of consignments per project?	If you have multiple sources of methanol feedstock, please provide a separate Appendix H workbook for each. You will need a separate Appendix H workbook for every consignment. If you need to expand the number of boxes in the application form beyond the 3 consignment results given, please do so. There is no upper limit to the number of consignments per project, but if you have more than five consignments, please email LCFF@WSP.com as we may be able to provide a weighted average Appendix H spreadsheet that could help. This is discussed in more detail in the first GHG briefing session and we encourage you to watch the recording.
117	Please, can you share more information on how you will deal with potential conflicts of interest with the delivery partners? We are already working with ERM on our project, albeit with a completely different department than that covering the LCFF.	We have a Conflict of Interest procedure internally, including a log monitored by DfT. Separation protocols are in place. All SharePoint sites are restricted access and only the LCFF team has access to these. Anyone working on LCFF is excluded from working on other projects for applicants. Assessors and Monitoring Officers declare any Col and if there is any perceived Col they are restricted from working on those projects.
118	In previous grant funding windows, up to 50% of eligible procurement costs could be included within the funding request. Could you explain why this provision has been removed for the current LCFF window, and whether procurement costs are expected to become eligible again under the second LCFF window following FID?	In previous rounds of the AFF, Procurement of Main Equipment was eligible. In the LCFF, it is not eligible. Past experience has shown it was seldom used, and only some small demo plants had reached that point, with modest sums proposed. In the LCFF, a key priority is supporting commercial projects to Final Investment Decision. The Procurement of Main Equipment can be a high upfront cost for individual kit pieces, and so it was decided allocating budget to this stage was not as high a priority, given that once projects have reached FID, they should have already raised the necessary debt and equity to cover their equipment costs. For similar reasons, the additionality and need for grant funding for post-FID Detailed Design will also be subject to enhanced scrutiny. DfT will review whether these costs will become eligible in future rounds, depending on where the market is, and what is needed at that time.
119	Does the GHG threshold for the FOAK commercial plant (31 gCO2e/MJ) include the upstream emission or just the plant itself? Would appreciate if anywhere I can find the boundary.	Yes. This includes all upstream emissions from the point of collection of the waste/residue, or from the generation of the wind/solar/hydropower, or for nuclear back to the extraction of uranium ore - this system boundary will be explained further during the GHG emissions briefing. Appendix H sets out the tabs that are expected, from feedstock collection, transport, pre-processing, etc. Please include your jet distribution, storage and aircraft refuelling. For the downstream emissions, there is the option to use a default emissions factor. Please read the RTFO & SAF Mandate Technical Guidance which sets out the system boundaries to follow for the GHG Methodology. If you have any further questions, please submit them to the LCFF mailbox.
120	You mentioned that you would be assessing project economics to ensure IRR forecasts are at investable levels. This implies you have a view on what constitutes a project IRR that is investable for a FOAK project. Could you please share your view of minimum IRR thresholds that you will be assessing against	This is not an eligibility criteria, therefore DfT will not share specific thresholds used within the scoring criteria.

121	Would silage wrap be part of the RCF group, rather than ag wastes? i.e. it's a plastic residue	Please see Question 104 within the launch event section of the FAQs document.
122	Would any FEED design activities undertaken in period between now and January 2027 be eligible for the Grant funding for year 1?	No. The LCFF will only fund activities carried out after the start date on the Grant Funding Agreement. No prior work will be funded. Funding eligibility starts from the date given on your Grant Funding Agreement, which may be an earlier date than the date the agreement is signed. It is at DfT's discretion to set or amend the start date. Timely responses and cooperation with additional evidence or queries will assist assessment timelines.
123	There are costs involved in maintaining grid connection status to enable the grid provider to progress their substation developments. is this eligible from the LCFF?	If there are engineering design costs in replacing/changing/upgrading the grid connection, including related planning & permitting, these activities would likely fit under the eligible activities in the LCFF Guidance Document Annex D - if you can evidence these activities are needed for the proposed plant. Physical work on-site e.g. maintaining lines or installing a substation will not be eligible, as that would count as construction or operations. If the question is instead referring to a fee that will be due to maintain the project's place within a grid connection queue, this fee may be eligible, but further details will have to be provided regarding the level and frequency of this fee, how this was funded previously, and whether this fee might be refunded upon energisation of the grid connection.
124	How do you suggest applicants approach Q 2.2.1.2 "... it has not been possible to fund proposed project activities solely from private sector ...", in view of the preference for high levels of match funding?	We assume this refers to Question 2.2.12 (which is linked to Section 5.7). Question 2.2.12 is a binary question asking if it has been possible or not to find private funding on reasonable commercial terms to cover any of the share of the activities for which a grant is sought - i.e. whether the project has chosen to turn down available private funding (including internal sources) in order to claim a grant or claim more grant funding than otherwise could have been required. Question 2.2.12 does not apply to the match funding being provided. There is some preference for higher levels of match funding, as this indicates stronger engagement with financial sources (essential for FID), and greater credibility of the project such that others (including partners) are willing to fund some of the DEVEX, providing momentum outside of government funding.
125	Biomass and non-biogenic energy (power and heat) input criteria are not clear - are the projects expected to be PTL with input of water and CO2 only?	PTL projects do not have to use only water and CO2 - there are other ways to make PTL consignments, e.g. adding green hydrogen into biogenic syngas can make a PTL consignment without use of added CO2. The Appendix H workbook for PTL is set out with water electrolysis and CO2 capture as the likely starting points, but if you are not using those upstream steps (e.g., you have onsite Direct Air Capture), please ignore the upstream tabs and only fill in relevant tabs. This will be discussed further at the GHG briefing session. Please email the LCFF mailbox if you have further questions regarding feedstock eligibility criteria.
126	Any Detail engineering activities to support Long Lead items procurement process be covered under eligible costs	Yes, up to a maximum 50% grant funding intensity. In order to for a project to procure a piece of equipment with a long lead time, the cost of the long lead item itself will not be eligible, but the detailed design for that, would be.
127	Can you provide more detail on what is considered as FOAK and NOAK. Is this UK-specific? When would a system become NOAK instead of FOAK?	TRL is not UK-specific. A First of a Kind (FOAK) commercial plant (TRL 8) does not have a fixed scale, as it will vary depending on the feedstocks and technology pathway. Different solutions might be commercially viable at different scales, and we will be looking for evidence via Appendix E of the profitability of the FOAK plant. The distinction vs Nth of a Kind (NOAK) commercial plant (TRL 9) is that, for FOAK, there will not already be multiple plants using that specific technology deployed and operating (or about to) globally, at a similar or larger scale than proposed for the LCFF. DfT are not looking to grant fund a technology that is already commercialised and profitably deployed at scale (i.e. no market failure to correct). If you have concerns regarding TRL eligibility, please reach out to the LCFF mailbox.

		If there is a similar project being developed overseas on a similar timeline for as the UK FOAK project, that is likely to be OK/likely to still be TRL 8 once operational. If there are several similar projects in development ahead of the UK project, this could be more marginal. If there are many larger commercial plants already operating, the technology is likely already at TRL 9.
128	Can you confirm whether geotechnical site investigations and ground condition surveys undertaken to support FEED design, foundation design, permitting and project development are considered eligible expenditure under LCFF Window 1?	Provided there is evidence that these boreholes are necessary for the eligible activities in Pre-FEED or FEED or Detailed Design, this is fine. Digging boreholes for site building works, construction, or similar are ineligible. Please see Question 81 within the pre-populated section of the FAQs document.
129	Are costs associated with request for quotations or issuing tenders eligible, if no purchase orders/ contracts are issued and therefore equipment/services are not procured?	Yes the costs of tendering are eligible. Please see Question 82 within the pre-populated section of the FAQs document.
130	Are any operational costs of existing pilot / demo systems or sub-systems in support of FEED activities eligible spend?	Potentially, please see Question 66 within the pre-populated section of the FAQs document.
131	We understand maximum grant funding rate can be up to 100%, but private co-funding is looked upon favourably. Are you able to specify a minimum level of co-funding to maximise chances of success or provide data on the accepted co-funding rates from previous rounds of the AFF?	There is no minimum level of match funding required for Pre-FEED and FEED, but at least 50% is required for Detailed Design. Projects with higher levels of match funding will achieve higher marks in one of the scoring criteria. DfT will not provide match funding levels from the AFF competition, as this is commercially sensitive information.
132	How is the PTL-eligible share applied, is it time based?	We presume this refers to the situation where a small amount of feedstock electricity is derived from average grid mix electricity. When making calculations to determine if the LCFF eligibility criteria has been met for feedstock electricity (>90% PTL-eligible sources), please use the PTL-eligible % dataset in Annex E of the Guidance document, reading off the relevant grid (GB or NI) and the first full calendar year of operations. If the pathway has an intermediate fuel plant that is overseas, please source a similar national PTL-share projection from that country's grid operator or government (or similar authoritative body) for the first full calendar year of operations. We note that the PTL-eligible share of any average grid mix electricity is likely to change over the course of your plant's operational lifetime, so it is recommended you reflect these changing consignment tonnages over time in Appendix E, given the different GHG intensities and pricing.
133	For a project utilising an imported intermediary fuel that fully satisfies the feedstock PTL requirements through renewable electricity, renewable hydrogen and captured CO ₂ , can you clarify whether the downstream conversion energy requirements affect the PTL classification of the resulting SAF, or only its lifecycle GHG intensity?	We presume that "energy requirements" within the SAF conversion plant refers to the usage of energy only as process input, e.g. electricity and natural gas to run process units, compressors, pumps etc, and any use of hydrogen is only as a process input in final hydrotreating. If this is the case, then these process inputs only impact the jet GHG intensity, and do not impact the SAF consignment types/classification. Further details regarding the pathway and the energy inputs will be required to give a more precise answer. Ultimately, the applicant needs to follow the SAF Mandate Technical Guidance, which defines whether an input is a feedstock or process input - as it is possible for some SAF conversion plants taking in an intermediary fuel to also consume e.g. feedstock electricity or feedstock hydrogen, altering the SAF consignment types/classification.
134	Just to clarify your comment just now....if a project is not selected for LCFF (but had met the eligibility criteria) did you mention that there are no implications for future RCM selection?	The LCFF is a separate scheme from the RCM, therefore success or failure in being selected for LCFF funding does not have implications for future RCM applications.

135	Are feedstock commitments a consideration? Will projects with long-term security of feedstock be advantaged?	Yes. Feedstock supply agreements are part of Question 5.1.1 of the application form, providing the current status of your project development. We require evidence of how progressed the project is in getting feedstock MOUs, HoTs or full agreements signed, and for what tonnage of feedstocks, plus how secure and long-term those agreements are likely to be. A project with a draft MOU for a low % of the required feedstock for 5 years of operation is materially more risky than a project with a draft final agreement for 100% of its feedstock over 20 years. However, we note that feedstock commitments are one of various criteria within Question 5.1.1 of the application form.
136	Are applications from consortia encouraged versus applications from single companies?	There is no preference - applications can be from single companies or a consortia. In section 1.3 of the application form where you list your partners, you must clarify whether the partner will receive any grant funding and/or provide any match funding, and what their role is (e.g. full project partner providing match funding/technology/feedstock etc, or a subcontractor paid for a service).
137	The guidance refers to directing a significant proportion of funding towards a relatively small number of projects capable of delivering SAF at scale. Whilst the scoring criteria are clear, could you clarify what additional factors will be used to distinguish between multiple high-scoring projects when allocating funding? For example, to what extent will factors such as production scale, route to market, integration with existing fuel infrastructure, contribution to UK SAF supply and certainty of deployment influence those decisions?	The Guidance document pages 13-14 sets out main considerations used in the funding allocations, including technology diversity, and what DfT expect to see for commercial scale projects to be able to achieve FID. In the unlikely event there are multiple large budget bids with extremely similar yet high scores, it is these factors as well as any significant unmitigated risks identified during the assessment phase (that could reduce the certainty of deployment) that will be taken into account in the final decisions by DfT. The factors listed in the question will have some impact on the project's commercialisation strategy and risks, as will other factors. These will already be part of the scoring - there is no single tie-breaker factor employed.
138	What are the minimum and maximum grant sizes, and is there a preferred funding intensity or co-funding requirement?	There are no minimum or maximum grant funding sizes, other than the level of total LCFF Window 1 funding available. Funding intensity for Pre-FEED and FEED can be up to 100%. Funding intensity for Detailed Design can be up to 50%. Projects which can evidence higher levels of secured match funding will be preferentially scored.
139	Does match funding need to be cash, or can in-kind engineering be considered as qualifying?	Match funding can be cash or in kind. It can be either be from a third party or from the grant recipient's own resources.
140	I am surprised given that the LCFF is focused on TRL (5), 6, 7, 8. Why is a clear road path to long term commercial profitability not a major scoring criteria.	TRL 5 pilot plants are not eligible for LCFF funding. In Table 2 of the LCFF Guidance Document, scoring criteria grouping 6 is focused on setting out a clear roadmap to commercial operations, grouping 7 is focused on the longer-term commercial roll-out, and grouping 8 is assessing a commercial plant's profitability. These are all important scoring criteria, and also tie into grouping 1 in terms of meeting the overall LCFF objectives.
141	Do we have an early indication of when the next (2nd) window could be open?	As specified on page 1 of the LCFF Guidance document, any potential second LCFF Window is currently expected to be announced later in 2027, subject to usual business case development and DfT internal approvals.
142	An application is likely to contain information confidential to the applicant and our licensors. Do we need to execute an NDA with the LCFF prior to submission, or must we be careful to exclude confidential information from the application?	DfT, as well as WSP & ERM via their contractual arrangements with DfT, will not enter into NDAs as Civil Servants are bound by the Civil Service code, and certain FOI processes. We treat any information as confidential if it is marked as such. However, we do have legal obligations under FOI & EIR processes - please refer to Questions 100 & 101 within the pre-populated questions section of the FAQs document. There are some further details on confidentiality on pages 17 and 18 of the guidance document and final section of the application form.
143	In Appendix E there are slots for two SAF consignments. if we have feedstock consignments >2 should we also extend Appendix E to match the number of consignments and	Please extend Appendix E adding as many rows as needed. You will need to add a row for the tonnage for that consignment, the price for that consignment, and then the revenues per year for that consignment. Please ensure

	provide strike price for all of them or should we only provide an average strike price?	to change the total revenues formulae at the bottom of the revenues section includes all the new rows that have been added.
144	How much weight will be given to projects that are not yet ASTM-qualified but have a credible qualification route?	We encourage projects to provide as much recent, relevant evidence in Appendix B as possible (fuel characterisation studies, partial or full testing evidence from independent labs or commercial partners), and explain where they are in terms of their testing or if they are yet to start testing, and what expectations and backing evidence they have regarding likely timelines & costs for ASTM qualification. Pathways already qualified will be scored as lower risk on this criterion, but we would still encourage projects with potential to apply.
145	Would a hub and spoke architecture be viewed as a single project or multiple projects, for assessment purposes?	Please see Questions 1 & 2 of the pre-populated FAQs. We presume that spokes are intermediate fuel plants, and the hub is a UK SAF conversion plant.
146	Will financing costs like lenders and equity advisors eligible? Also will EPC tendering costs like FEED verification and bidding costs be eligible?	Financing costs would generally fall under "securing private sector funding" and therefore be eligible, however, as set out in the LCFF Guidance document Annex D, lenders' legal advice costs will not be eligible (unless they are a project partner named in the application). EPC tendering costs will also be eligible, but note the maximum grant intensity rates post-FID are only up to 50% - the maximum grant intensity is determined by the project lifecycle stage, not the activity.
147	The guidance states that eligible RCF feedstocks must be the fossil fraction of MSW, including household-like waste from commercial or industrial premises. Could you clarify whether separately collected, non-recyclable post-industrial PP and PE could fall within this definition? If so, what evidence would be required?	Separately collected, non-recyclable post-industrial PP and PE are not on the list of eligible RCF feedstocks. Please also see Question 13 of the Pre-populated FAQs.
148	If the LCFF supported project produces an intermediate fuel that is subsequently co-processed at a refinery to produce SAF, rather than being directly blended into SAF, does that affect the project's eligibility for LCFF support?	Please see Question 1 within the pre-populated section of the FAQs document. In this case, the LCFF supported project would be the intermediate fuel project, as the intermediate fuel requires some processing at a refinery. Following the Question 1 criteria for this case: - The feedstocks used in the LCFF intermediate fuel project would need to be eligible - Both the LCFF intermediate fuel project and the refinery would need to be in the UK. - The refinery would need to be involved as a project partner in the LCFF intermediate fuel project - There would need to be at least signed HoTs for >80% of the LCFF intermediate fuel to be consumed by the refinery to produce SAF. - Both the LCFF intermediate fuel project and the refinery need to be included within the application, with separate budgets and replicated tables in the application from provided for each. If there are no technical or logistics changes proposed at the refinery to co-process the intermediate fuel, it is expected that the refinery's share of the proposed LCFF budget would be minimal. However given the use of an existing UK refinery in the pathway, to meet subsidy control regulations, some additional criteria also apply to any refinery budget requests: • Any refinery business/activities which would have happened in any event are not eligible for support. • Any refinery business/activities relating to parts of the refinery outside of the refinery unit(s)/section that co-processes the intermediate fuel are not eligible for support.

		Any refinery business/activities that are not targeted at the development of SAF production via the chosen pathway (e.g. co-processing unit design changes to increase diesel production) are not eligible for support. Furthermore, the refinery unit(s)/section that co-processes the intermediate fuel (not the whole refinery) will still need to show >50% jet will be achieved within the fuel product slate from these refinery unit(s)/section, in order to satisfy DfT that this pathway is able to generate meaningful volumes of eligible SAF. For example, a refinery co-processing section that only generates 20% jet fuel will not result in an eligible pathway, even if the criteria in the above bullets are met. This is to satisfy the first eligibility criterion listed in the LCFF Guidance Document, as the jet product slate test applies to the whole pathway, and given the refinery must be included in the application. Please note the above is indicative and a full assessment of your application documents would be required to determine LCFF eligibility. Meeting the requirements above does not ensure eligibility as this is based on a number of factors outlined in the LCFF Guidance document.
149	Following ERM's comment about Section 1.3 of the form (partners), how would mentioning a subcontractor in this section (one that makes no contribution of funding) be taken into account the assessment?	Subcontractors will receive grant funding via the lead applicant, but are unlikely to provide match funding. Project partners will receive grant funding via the lead applicant, and generally will provide some match funding, but do not have to - they might be listed as a partner given a specific role, large budget share or other strategic reasons. However, it is the total match funding across the project's eligible activities that is taken into account in the assessment, and the evidence behind this (how secure this funding is, etc.).

GHG briefing questions and answers

Ref	Question	Response
150	Most facilities will require hydrogen as part of the processing (e.g. hydrogenation, NOT as main feedstock). This can be generated onsite by sacrificing part of the main feedstock (e.g. some of the biomethane/biomethanol). If this feedstock is negative CI (<0gCO ₂ e/MJ), can it be used to generate this hydrogen?	Yes, noting that there are SAF Mandate rules capping the negative emissions of some feedstocks (e.g. biomethane via the gas grid). The ≤10% of jet hydrogen cap applies only to non-waste fossil hydrogen production/purchases, it does not constrain hydrogen made from eligible biogenic feedstocks. Hydrogen generated inside your plant boundary will be included within the mass/energy balances rather than being entered as a delivered input in Appendix H, so the feedstock GHG intensity will flow through the consignment accounting - there is no additional separate credit required for the diverted portion.
151	For projects that have previously completed the lifecycle assessment Appendix H as part of AFF Round 3 work, should applicants expect a broadly consistent methodology with the new LCFF templates, or have there been any material methodological changes that could significantly affect previous results? The changes to the PtL structure is already acknowledged as one change but this seems largely structurally from initial review.	"The GHG methodology remains fundamentally the same - it follows the RTFO & SAF Mandate Technical Guidance (Annexes C/D/E by consignment type). Applicants should find the structure broadly familiar, however, applicants should not rely on prior AFF results without re-running them in the new Appendix H, as there are several changes, including: (i) LCFF uses fixed GHG thresholds by plant type (≤31.0 gCO ₂ e/MJ LHV FOAK; ≤53.4 gCO ₂ e/MJ LHV demo) rather than the AFF trajectory for RCF consignments; (ii) There are updated Annex E GB/NI grid GHG intensity projections (iii) Demo or Pre-FEED FOAK projects will be able to use delivered GHG intensities for their feedstocks if they wish, rather than filling all upstream steps

		(iv) There is an optional +1.2 gCO₂e/MJ default for downstream jet distribution, rather than filling downstream steps (v) There are checks that all information has been provided before a final GHG intensity result can be generated"
152	The guidance includes additional clarification regarding hydrogen acting as a process input rather than an intermediate feedstock. Could ERM provide any further clarification on how this distinction should be treated within Appendix H calculations and confirm that the carbon intensity of the hydrogen should be accounted for if a process input? Please also confirm that hydrogen used within the final hydrogenation step of an MtJ conversion plant is classified as a process input.	The SAF Mandate Technical Guidance provides the distinction between feedstock and process input hydrogen. Hydrogen used in a final hydrogenation/upgrading step of long-chain alkenes within an MtJ plant will be treated as a process input, not a feedstock. Its GHG intensity must be accounted for - enter the upstream GHG intensity of supplying any input hydrogen in the inputs table of the "Conversion to jet" step. Also see question 150 in case the hydrogen is not an input, but internally generated.
153	Can I clarify how a PPA with low-carbon non additional sources would be treated in relation to RFNBO/PtL portion (Annex E table 1)? (I understand GHG intensity would be grid in this case, based on Annex E table 2)	"Eligibility (share): the LCFF is using the SAF Mandate PtL requirements, except it is not requiring evidence of additionality if additionality is being claimed by the applicant. A non-additional wind/solar/hydro/geothermal/tidal/wave or nuclear PPA can fully count towards your PtL-eligible share of feedstock electricity. GHG intensity: if sourcing electricity from non-additional PTL-eligible sources, the Annex E grid GHG intensity value for the relevant year/location will apply to the emissions calculation."
154	How can we handle situation where feedstock supplier mix and hence GHG emission reduction changes/improves from year 1 to year 5?	The LCFF eligibility assessment is based on the first full calendar year of operations, including the >90% of feedstock electricity eligibility requirements. You should therefore model the supplier mix and resulting GHG intensity expected in that first full calendar year, and each consignment must meet the applicable GHG threshold on that basis. Anticipated improvements in later years may be described as supporting context but do not replace the first full calendar year assessment, and cannot be used to bring a non-compliant Year 1 result below the LCFF GHG threshold. If for some reason your project's GHG emissions will be increasing over time, you should submit Appendix H files for both the first full calendar year and for the year that has the highest consignment GHG intensities. Also ensure any changes in GHG intensities over time (up or down) are fully reflected in Appendix E across the project lifetime.
155	I am a bit unclear about the different appendixes that we need to do for different feeds. is that all separate or should it be all linked at the end?	A separate Appendix H workbook is required for each consignment (mandatory). They are not merged into a single file, and the plant input/output data should be pro-rated by consignment LHV energy content in each Appendix H workbook, so that the sum of tonnages across Excel workbooks for any plant flow must equal the plant total for that flow. You then report each consignment's result separately in the application form, and if necessary expand the Appendix E rows to reflect each consignment's likely different revenues (given the different GHG intensities).
156	If some fraction of the feed is mixed MSW and industrial Origin feed. Would the appendixes still be done separately or just for the MSW fraction? or considered as a whole?	It is unclear what this "industrial origin feed" is, and whether this feedstock would be eligible - we would suggest you email the mailbox or complete an eligibility pre-check with more details. One potentially eligible example could be waste industrial fossil gases rich in CO, as these are an eligible RCF feedstock. MSW must be split into a biogenic fraction (biofuel consignment) and a waste fossil fraction (RCF consignment), and waste industrial fossil gases rich in CO will generate a separate RCF consignment. A separate Appendix H is therefore required for each resulting consignment, following the relevant GHG methodologies, with plant data pro-rated by LHV energy content and each consignment meeting the LCFF GHG threshold.

157	How will you consider the risk associated with CCS credits within the calc considering the planned progress for UK CCS projects, if these should not be available by year 1, even if they are forecast to be onstream currently?	"GHG performance is assessed on the first full calendar year of operations, so CCS credits may only be claimed if there is reasonable confidence the CO₂ transport & storage network will be operational and available to your plant in that first full calendar year. If you have provided evidence as to why the CO₂ network will likely be available in time, your Appendix H files can include the CCS credit, as this is the base case assumption. However, if the availability/timing of the CO₂ network is uncertain, we would recommend you take a conservative approach, i.e. do not claim the credit in Appendix H as your base case, but provide a separate Appendix H file with this upside of it being available. If the eligibility of your consignment GHG intensities depends on a CCS credit, this needs to be made explicitly clear with both versions of Appendix H provided (with and without CCS), and evidence provided as to the factors that will determine the likelihood of this CCS credit being available in time, to justify what is the more likely base case. DfT will not apply a probabilistic/weighted risk discount to the CCS credit. Please do not provide a ""minimum CCS credit"" case in Appendix H for an optimised CO₂ capture rate to just meet LCFF requirements unless this CO₂ capture rate is your base case business model. Note any CCS credit claimed must be net of downstream CCS emissions (transport, compression, injection, leakage). Please also be very clear in Appendix E (financial model) as to what dates and CO₂ tonnages sent for sequestration are assumed, and ensure the consignment GHG intensities over the plant lifetime and therefore the revenues align with these dates and CO₂ tonnages."
158	How will non-UK carbon storage be assessed? Are there any documentation requirements?	As per the SAF Mandate Technical Guidance, there are no specific requirements. It is assessed on the same basis as UK storage: CO₂ sourcing and any CCS credit must follow the RTFO & SAF Mandate Technical Guidance. Furthermore, the 1000gCO₂e/kg CO₂ credit must be reduced to reflect all downstream emissions: transport (which may be greater for export), compression, injection, storage and any leakages - calculated in the "Additional evidence" tab, with the tonnes/yr of CO₂ leaving the plant reported to match. Supporting documentation should be provided in Appendix B (with page references) evidencing the storage route, its availability in the first full operational year, and the emissions assumptions.
159	For FOAK, with multiple feedstocks and therefore product consignments for each product type, do all consignments need to meet the threshold for each product type and or all product types?	Each consignment must individually meet the FOAK GHG threshold of ≤ 31.0 gCO₂e/MJ LHV in the first full calendar year of operations, and each consignment must have a separate Appendix H file completed. LCFF GHG compliance is assessed per consignment, not as a plant-wide average and not per product type collectively.
300	How do we account for GHG emissions when using combined heat and power from an EfW plant to capture CO ₂ for PtL SAF production, given the EfW is fuelled with fossil and biogenic MSW fractions; should combustion of both fossil and biogenic MSW count towards emissions or just the fossil fraction?	Please see question 172. Where the CO₂ capture plant is powered by electricity and/or heat generated by the EfW plant, account for both biogenic and fossil fractions using an LHV weighted average based on the feedstock split. The biogenic emissions will be small (minor CH₄/N₂O combustion emissions plus upstream waste supply emissions), while the fossil fraction has to account for these as well as the fossil CO₂ combustion emissions generated. When allocating emissions between heat and power, apply the Carnot efficiency to derive useful heat. The gCO₂e/MJ intensity of the heat will therefore be lower than that of the power, and these intensities will be used in the CO₂ capture step, where the PtL supply chain begins. It may be possible to evidence that the CO₂ capture unit is consuming only biogenic power while the remaining fossil power is sold onto the grid or to another user (if there is contractual evidence of the correct electricity volumes being sold with no associated biogenic credentials or claims), but this mass balancing is less likely to be feasible for the consumption of heat.

301	If we are using a grid-connected CHP plant to generate heat to capture CO ₂ , do this heat use an emissions factor of the grid (as the displaced power will be replaced by grid electricity) or do we use an emissions factor for the specific plant that is generating the heat?	The heat must use the emissions factor of the specific plant generating the heat, not the grid electricity intensity - even where the CHP plant is grid connected. This is because you are not importing heat from the electricity grid - the grid electricity intensity would only be relevant to imported grid electricity.
302	Do leaks of CO ₂ during the carbon capture process count towards GHG emissions, given that without the carbon capture process this CO ₂ would have been emitted to the atmosphere? A later clarification was that this would be for CO ₂ capture at the start of a PTL pathway.	For CO₂ capture at the start of a PTL pathway, any uncaptured CO₂ that remains in the flue gas does not count, as it remains outside the system boundary. Provided the CO₂ producer is following SAF Mandate rules about not claiming any reduction in emissions from the CO₂ capture, CO₂ that is captured and then leaks (e.g. from a storage tank) within the PTL chain carries a nil GWP burden when it is released into the atmosphere. If the leak occurs before the PTL, it will impact the GHG intensity of the delivered CO₂, because the same heat, power and chemicals are still expended to run the capture process, which is now delivering less CO₂, so the delivered intensity (gCO₂e/kgCO₂) increases. For completeness, if there is CO₂ capture being sent for sequestration at the PTL plant, then CO₂ arising from fossil process inputs such as natural gas that leaks will count as a fossil CO₂ emission, whereas CO₂ leakages arising from the original nil-burden delivered CO₂ will not have a GWP. This applies both at the PTL plant and in the downstream CO₂ transport & storage network. And note the PTL plant's CCS credit will also be reduced due to less CO₂ reaching/remaining in the sequestration site if there are leakages.
303	In Appendix H, the module main feedstocks do not have GHG emissions factors. For feedstocks such as electricity to stack for H ₂ electrolysis, there are GHG emissions associated with this which the template does not allow - how do we include these?	This is a recognised gap in the current PtL Appendix H workbook and an updated version will be issued to correct this. In the meantime, any emissions associated with the electricity delivered to the electrolyser stack should be captured within the energy input rows of the step containing the electrolyser. This intensity will be zero for additional wind, solar, hydro etc, but will be non-zero where nuclear, grid average or non-additional renewable electricity is used. More generally, the reason main feedstock inputs on the Appendix H tabs do not carry a GHG factor is by design, as each tab accounts only for the additional inputs/outputs and allocations arising in that step, with the incoming feedstock's emissions already calculated on the previous tab, and the emissions from all steps summed in the Summary tab. This step-by-step accounting choice is deliberate, to avoid multiple counting of emissions along the supply chain.
304	Question regarding the PtL workbook: the e-methanol being used for MtJ is produced by gasification of biomass to make bio-syngas. This bio-syngas then has additional electrolytic hydrogen added to it to make up the H ₂ :CO+CO ₂ ratio. The syngas is then used to make methanol (which is therefore a mix of biomethanol and e-methanol, according to the inputs of electrolytic or bio-hydrogen). Given that there is no CO ₂ capture process in this value chain, how should the CO ₂ /CO sourcing be taken into account? The CO ₂ capture tab in the Excel doesn't fit this process since the CO ₂ is generated from	This is a hybrid methanol plant producing both biomethanol and e-methanol, and therefore gives rise to two consignments. If your plant methanol plant contains any recycle loops, including heat/steam, please contact LCFF@WSP.com with details of your units and flows, and we will provide a bespoke hybrid version of the Appendix H template adapted to your configuration, for you to complete with your data and perform the required iterative calculations. If there are no recycles, it may be possible to use the two standard Appendix H workbooks separately. In the Biogenic workbook, complete the upstream biomass supply chain steps up to the point of biosyngas production (in the "Pre-processing" tab), and then include the biosyngas share of methanol plant inputs/outputs in the "Conversion to intermediate" tab and the biomethanol share of MtJ plant inputs/outputs in the "Conversion to jet" tab. In the PtL workbook, switch off the CO ₂ capture, processing and transport steps (as you are converting CO ₂ already in the syngas), so that the only upstream supply chain remaining is for electrolytic hydrogen, and then

	gasification of biomass and immediately reacted with excess hydrogen to make methanol.	include the electrolytic hydrogen share of methanol plant inputs/outputs in the "Conversion to intermediate" and the e-methanol share of MtJ plant inputs/outputs in "Conversion to jet" tabs. It is the LHV energy content ratio of biosyngas to electrolytic hydrogen within the merged syngas that determines the shares of biomethane vs e-methanol, assuming no recycles are present.
305	Are we allowed to use a feedstock from a PAS110-rated site? We intend to take the feedstock pre further processing to achieve PAS110. This would provide a beneficial commercial relationship with the site as they would not have to provide further processing to the digestate.	There is no PAS110 requirement under the LCFF, and PAS110 is also not a requirement of the SAF Mandate. Whether you choose to meet PAS110 is a commercial matter for your project and supply chain. AD digestate could be an eligible intermediate feedstock provided the original feedstock used in AD meets the LCFF feedstock eligibility rules.
306	Our system is hybrid and produces both biofuel and PtL with recyclable loops, so the new standard workbooks don't fit our process. For LCFF, do we need a new hybrid Excel template for Appendix H, or how should we try and complete Appendix H?	As per Question 7, a bespoke hybrid Appendix H workbook is likely to be needed for plants that use recycle loops and combine feedstock electricity with biogenic feedstocks. All projects with hybrid configurations are strongly encouraged to contact LCFF@wsp.com with details of their process as soon as possible, as it will take a couple of days to turn around a bespoke template for you to complete with your flow data and there are only a few working days left before the deadline. Alternatively, if you cannot provide details of your process steps, recycles and flow compositions in time to have a bespoke workbook created, we suggest for your LCFF application that you make an approximation by drawing your boundary around the whole plant, to avoid any recycle loops or iterative Excel calculations. This would mean your consignment shares will be based on the input feedstocks to the plant, not where the feedstocks (or subsequent intermediates) combine within the plant. Then to complete each standard Appendix H workbook, you would pro-rate the plant inputs/outputs by consignment and only include the upstream supply chain steps relevant to that consignment. Also see Questions 155 and 304. However, this approach will only given an approximation of your consignment shares and GHG intensities. Therefore, during the clarification questions stage, DfT will expect any hybrid plant that has used this approximation when applying to continue providing more details of your process and to complete a hybrid Appendix H ahead of any grant award, to ensure your eligibility.
307	For the "Conversion to jet" tab, our process is methanol-to-jet. The hydrogenation hydrogen will be coming from methanol reforming on site (using a small portion of the methanol being supplied to the plant). How should this be taken into account in the Excel? Given the biomethanol sourcing GHG emissions have all been taken into account upstream, can we assign 0 GHG emissions to the hydrogen as an input?	Where hydrogen is produced by on-site methanol reforming, no hydrogen crosses your system boundary, so it should not be entered as an input. The correct treatment is not to assign a zero GHG intensity to the hydrogen, but to enter zero tonnes/yr (or zero MWh/yr) in the hydrogen input row, and then ensure that the total feedstock flow in the module main input includes both the feedstock methanol and the methanol that will be reformed to produce the hydrogen. The effect is that your plant will be slightly less efficient, and the associated extra emissions for supplying the extra methanol will then be accounted for in the upstream steps.
308	Where the same source of biomethane is used for both fuel gas and feed gas in the "Conversion to intermediate" (methanol production) tab, how should this be modelled in Appendix H, given the context that fuel gas cannot have a carbon negative CI but feedstock gas can?	Your interpretation of the SAF Mandate is correct: biomethane used as a process input has its GHG intensity capped at zero (so cannot be carbon negative), whereas there is no such restriction on feedstock gas. In the "Conversion to intermediate" tab, include only the tonnage of the feedstock biomethane as the main module input (noting that if the feedstock has a negative GHG intensity, a more efficient plant moves your result slightly closer to zero, i.e. less negative). The fuel gas flow should then be entered in the process inputs table, and if it arrives with a carbon negative GHG intensity, enter 0 in the GHG intensity column for that fuel gas input row. Do not

		include the fuel gas flow within the main module input, because of the different GHG intensities that are permitted to be reported.
309	We are using a recycled carbon fuel feedstock that does not have a prior use. How should we change the counterfactual information in the RCF counterfactual tab? The cells don't allow us to change any of the inputs. We also have another feedstock that does have a counterfactual, but when I change the emission factor it gives an error and says not to change the number.	There are currently only two eligible RCF feedstocks. For MSW, the counterfactual is pre-determined as an EfW plant at 22% electrical efficiency. For waste industrial gases rich in carbon monoxide, the SAF Mandate rules require evidence that heat production has not been displaced, together with site-specific information on the prior counterfactual use. The locked cells result from data validation applied to limit deviation from the MSW counterfactual. If you have a bespoke counterfactual for waste industrial gases (e.g. 0% efficiency where you can evidence prior flaring/venting), please go to the relevant "RCF counterfactual" tab, select Data > Data Validation > Clear All, and enter your evidenced values. The same approach applies to the emissions factor issue you describe.
310	Our process uses RWGS and FT. Should these be combined into one "Conversion to intermediate" sheet or separated for calculations?	Be guided by the degree of heat integration and recycles between the units. The standard PTL workbook cannot perform iterative recycle calculations, so where there is heat integration or any recycle loops between the RWGS and FT steps, you should combine them within a single tab, otherwise you risk omitting some of those flows. If you are producing FT waxes that are upgraded elsewhere, put RWGS and FT together in "Conversion to intermediate" and treat the wax upgrading as "Conversion to jet". If everything occurs onsite through to finished jet fuel, you may combine them all in one tab. Also be guided by the data you hold: your feasibility or pre-FEED study may only provide overall plant data rather than a unit-by-unit breakdown, which affects how you can evidence the flows. Please also note that v4.0 of the PTL Appendix H workbook is now published on the LCFF website, with a few corrections to upstream elements, please download and use this latest version in your application (refreshing your browser cache if v4.0 is not visible).
311	Our two-stage biomass pyrolysis and upgrading process generates significant volumes of steam that will be utilised internally to generate electricity. The current vendor of the front-end pyrolysis technology has a modular design that does not generate electricity with their waste heat. Is it OK to make assumptions on typical industry % efficiency of electrical generation from this steam in our GHG calculations? The internal power generation from steam will be part of FEED. [Applicant subsequently clarified this is all on the same site.]	Yes, it is acceptable to make assumptions based on typical industry efficiency, provided you give a good reference that is well aligned to the temperature and pressure of your steam, and take a realistic or conservative view. Note, however, that if all of the steam is used internally to generate electricity and all of that electricity is consumed internally, this remains entirely within your system boundary and will not appear in the workbook at all: on a single site you would simply have biomass in and jet fuel out, with no exported electricity co-product. Only where you generate more electricity than the plant consumes should you calculate the excess and report it in the co-product electricity export row, with no electricity input entered. Conversely, if internal generation is insufficient and you still import grid electricity, that residual import is entered in the electricity input row.
312	We have six consignments (six different suppliers providing e-methanol or bio-methanol). One of our suppliers is struggling to share technical data for their process of methanol production due to confidentiality/NDA issues. We have a draft heads of terms with this supplier with an overall guarantee of methanol carbon intensity (gCO ₂ e/MJ methanol) but we may not be able to get specific plant data (i.e. electricity consumption, catalyst use, wastewater generation and other H&MB specifics). How can we approach	See the response to Question 203. Wastewater emissions, like catalyst emissions, are likely to be immaterial. The relative volume of each consignment will also be taken into account in the assessment, i.e. any reduction in score is likely to be more modest if this limited evidence/reduced transparency issue only applies to 1 of 6 consignments used in your MtJ plant, and is well explained.

	this consignment in Appendix H? [Applicant subsequently clarified the project is at FEED stage.]	
313	Our process is designed for thermochemical recycling of PE and PP into a SAF feedstock. Given that PE and PP are inherently recyclable polymers but are also present in municipal solid waste (MSW), would PE/PP fractions sourced from a MRF be considered eligible feedstocks under the LCFF? Specifically, is feedstock eligibility determined by the material type (PE/PP) or by the source and waste classification of the feedstock? If so, how should we work with our system boundary and our workbook?	Eligibility is determined by the original feedstock source, not the material type (PE/PP). Waste plastics sourced directly as a separate collected stream from a consumer site are not eligible under the SAF Mandate or LCFF. However, as per the DfT list of feedstocks RCF definition, PE/PP separated at a materials recovery facility (MRF) can be eligible if the MRF is operating in accordance with ISO 15270 (or equivalent standards) and can trace the back to the source of the original mixed MSW feedstock. This must be evidenced in your application, along with evidence of compliance with the waste and waste hierarchy definitions. For Appendix H, you must start from the original eligible feedstock, i.e. include MSW collection, transport, pre-processing at the MRF (with allocation across MRF outputs, noting metals will carry no allocation due to nil LHV, whereas RDF and any heat exported would be co-products), followed by transport of your PE/PP-rich stream and then conversion. The RCF counterfactual remains grid electricity at 22% electrical efficiency, as that is the counterfactual applying to MSW. If you can demonstrate the stream is ~100% fossil, one RCF Appendix H workbook is sufficient. If the stream contains bioplastics or biogenic contamination from other MSW fractions, you will also have a biogenic consignment and must complete the corresponding biogenic Appendix H workbook, which will have no RCF counterfactual tab but will carry the same upstream collection, transport and MRF emissions.

LCFF@WSP.com mailbox questions and answers

Ref	Question	Response
160	Eligible feedstocks evidence and ASTM clarification - for a commercial MTJ project using purchased biomethanol and/or renewable e-methanol, please confirm the level of evidence expected at application stage to demonstrate eligibility of the original feedstocks underlying the methanol, particularly where final supplier contracting remains under development.	We would expect to see documentation from the potential supplier(s) confirming what the original feedstocks will be, and therefore their likely compliance with LCFF eligibility rules - this can be supplied in Appendix I. If contracting is at an early stage, this may only be emails or draft MOUs, but if more advanced could be HoTs or Feedstock Supply Agreements. If the potential supplier(s) plan to provide you with methanol from existing plants, chain of custody evidence from their original feedstock suppliers, and/or sustainability certification for this methanol (which will typically list the original feedstock) we recommend submitting this to support your evidence. If the supply will come from a new methanol plant, any pre-certification evidence and discussions this plant is having with original feedstock suppliers would be recommended.
161	Please confirm whether an MTJ pathway relying on the recently amended ASTM D7566 Annex A5 should now be recorded as ASTM-qualified for LCFF Questions 2.2/3.3	Yes, this can be recorded as Case i / qualified, given recent ASTM approval. https://www.astm.org/news/aviation-turbine-fuel-standard-revised
162	For commercial-scale project that has already completed an initial FEED study and remains pre-FID, we intend to appoint an EPCM contractor to undertake an initial FEED verification and validation phase before progressing the design. This will include design-basis verification, gap analysis, H&MB and PFD/P&ID review, licensor/interface verification, constructability review, cost-estimate and schedule validation and development of the project execution plan. Can DfT	Yes, these costs will be eligible, although evidence should be provided as to the necessity of this additional verification/validation.

	confirm that the EPCM costs associated with this FEED verification and validation phase are eligible LCFF expenditure, provided the activities are undertaken within the grant period and have not previously received public funding?	
163	For commercial-scale project that has already completed an initial FEED study and remains pre-FID, we intend to appoint an EPCM contractor to undertake an initial FEED verification and validation phase before progressing the design. This will include design-basis verification, gap analysis, H&MB and PFD/P&ID review, licensor/interface verification, constructability review, cost-estimate and schedule validation and development of the project execution plan. Would those activities be treated as FEED expenditure, rather than detailed design within EPC for the purpose of the applicable grant intervention rate?	The maximum grant funding intensity will be determined by the project lifecycle stage. The boundary between FEED and Detailed Design/EPC is the Final Investment Decision (FID). If FID has not taken place yet and the project remains in FEED, up to 100% of eligible costs may be claimed, but as soon as FID is taken, only up to 50% may then be claimed.
164	Annex D identifies tendering, bidding and vendor/subcontractor engagement as eligible activities, while equipment procurement is excluded. Can you clarify whether the applicant/EPCM's procurement-team labour associated with developing RFQs, bidder engagement, commercial and technical bid evaluation, negotiation and preparation of purchase recommendations is eligible up to the point of equipment purchase, provided that no equipment material or purchase-order value is claimed?	Yes, correct.
165	Technology supplier for our application - We have a technology supplier who will be providing the SAF technology for our plant. If we were to be successful in our application for the LCFF and then discovered that this supplier was not able to provide the technology, would we be able to pivot to a back-up technology supplier and how would this affect the grant?	Yes, this could be possible. This would require a Project Change Request, which would be subject to usual DfT checks/approvals. Additional budget will not be available, but if the new supplier is cheaper (e.g. lower FEED licencing fees) DfT will expect to see these lower costs reflected in the Project Change Request. You would be expected to evidence that the new technology supplier means the pathway still meets the current TRL 5 eligibility criterion.
166	Please could you clarify how you would prefer us to proceed with Appendix H. Our current total feedstock consists of 5 Bio/RCF consignments and 2PTL consignments. All consignments independently meet the 31 gCO ₂ e/MJ SAF threshold for a FOAK commercial plant. Can we proceed with the approach to complete an individual Appendix H for each consignment?	Yes, please provide the 7 separate Appendix H workbooks. You will have to expand the Appendix E workbook rows to reflect these additional consignments.

167	Partnership: Where an applicant has been awarded LCFF funding and subsequently enters into a partnership during the funding period, how should that be managed both during the funding period but also how can the potential for this best be reflected in the application?	Bringing in new partners to an ongoing project would be subject to a Project Change Request, and usual DfT checks/approvals. Additional budget will not be available, but if the new partners are bringing in additional match funding, this should be reflected in lower grant costs within the Project Change Request. Your application should be submitted on the current base case arrangements, and evidenced current match funding. You can discuss the potential for a future partnership in your application, including within your commercialisation strategy, and how this partnership might assist/impact the project, and you are encouraged to submit evidence in the Appendices regarding this partnership and how likely it is to materialise.
168	Submitting application and supporting documents: During the AFF, it was possible to set up a SharePoint folder for submitting the application and the supporting documents. Is that possible this time? If so we would like to do that again.	Yes, this will be possible, please liaise with LCFF@WSP.com to set this up in good time and test ahead of the deadline.
169	Can DfT confirm how commercial sensitive and confidential information submitted as part of an LCFF application, including information originating from third parties and information potentially subject to Freedom of Information requests, will be treated and whether redacted supporting documents are acceptable where full versions contain proprietary or confidential information?	Please see Question 100 of the pre-populated FAQs.
170	Our Demo SAF production plant is proposed to be sited at a waste wood CHP plant. The waste wood CHP plant would provide a source of CO2 and originally also most of the power requirements. However, under the LCFF rules 90% of the feedstock power must come from non-biogenic renewables. The point raised by the CHP plant owner relates to the potentially intended outcome whereby, under the current rules, our SAF project will be importing renewable power via the grid whilst the CHP plant will be exporting renewable power (under the broader definition) to the grid. The point we are seeking to understand is whether the current interpretation creates an unintended outcome whereby CHP plant exports renewable electricity to the grid while a neighbouring SAF facility imports renewable electricity from elsewhere, despite there being no increase in biomass usage and no deterioration in lifecycle GHG performance. We are not suggesting any change to the definition of biomass; rather we would welcome confirmation as to whether DfT has considered this specific scenario and whether any site-specific flexibility exists where a) the generation asset already exists, b) fuel is derived from qualifying waste/residue	DfT considered this scenario during the LCFF design phase. For LCFF window 1, DfT have decided to exclude contracting with biogenic or fossil power generators for the feedstock electricity, although accept there is up to 10% flexibility allowed on the source of the feedstock electricity that is imported to the proposed SAF plant. This flexibility was designed mainly for PTL plants sourcing wind/solar/hydro electricity at high load factors to be able to mitigate very high PPA costs via some use of average grid mix electricity (given increasing shares of this average grid mix will also be from eligible wind/solar/hydro/nuclear sources).

	streams, c) biomass consumption does not increase as a result of the SAF project and d) lifecycle GHG performance remains fully compliant.	
171	"Please can we ask DfT/WSP to confirm a firm grant agreement date that we can use as a basis for our LCFF application. We would further request and recommend that the date be as early as possible, noting that the LCFF Funding Year is officially 1 Apr 2026 to 31 March 2027. This could allow for example a grant agreement date of 1 Oct or 1 Nov or even 1 Dec 2026 to be used. This would be of benefit to all ongoing UK SAF projects which could make a decision (fully at their own risk we understand) to keep projects moving forward rather than slowing down or pausing during this grant application process. It would also be of benefit to DfT and the funded projects collectively as it will give more time to spend the 30M allocated for Funding Year 1 rather than trying to squeeze it into 3 months (Jan to Mar 2027). Having a firm grant agreement date now gives much better support to all applications as we can provide much firmer budgets and spending plans as even plus/minus 30 days can make a significant difference. And overall, it does not risk increasing the time to FID for the most advanced UK projects."	No. The LCFF will only fund activities carried out after the start date on the Grant Funding Agreement. No prior work will be funded. Funding eligibility starts from the date given on your Grant Funding Agreement, which may be an earlier date than the date the agreement is signed. It is at DfT's discretion to set or amend the start date. No start dates prior to January 2027 can be committed to at present. Timely responses and cooperation with additional evidence or queries will assist assessment timelines.
172	We are developing a PtL SAF project and have questions regarding the eligibility and GHG emissions associated with process heat used to capture the CO₂. This captured CO₂ comes from a nearby Energy from Waste (EfW) plant burning mixed Municipal Solid Waste. We understand both biogenic and fossil fractions of the MSW will have upstream collection, transportation and processing emissions, but the biogenic fraction will have nil combustion emissions when raising steam in the EfW plant for carbon capture. Can you confirm if the MSW fossil fraction also contributes nil combustion emissions to the process heat used for carbon capture, based on the RCF methodology (paragraph E.6 of the Technical Guidance), or does this RCF methodology only apply to RCF	CO₂ is not a feedstock, only a process input, so EfW used in CO₂ capture will not result in an ineligible fuel consignment. However, the GHG emissions for CO₂ capture could be material, as the RCF methodology only applies to transport fuels, and does not apply to heat & power generation - this is in line with DESZN methodologies (e.g. UK Low Carbon Hydrogen Standard). Therefore, the MSW's biogenic combustion of CO₂ emissions are taken to be nil burden and the fossil combustion CO₂ emissions need to be fully accounted for. The upstream & combustion emission of the biogenic & fossil fractions of EfW energy generation will be summed, and then allocated across the generated electricity and useful process heat/steam (by using the Carnot efficiency). These EfW heat/steam and EfW power intensity values will then be used to calculate the total gCO₂e/kgCO₂ captured CO₂ before any further CO₂ processing & transport emissions are added to reach the PTL plant. Please use the Appendix H PTL workbook. Please note, if EfW CO₂ is being captured and permanently sequestered, this will reduce the GHG intensity of the EfW heat and power (both biogenic and fossil fractions). However, as per the SAF Mandate Technical Guidance, CO₂ being captured for PTL cannot be claimed by the EfW plant as a reduction in

	transport fuels and hence the full fossil combustion CO2 emissions need accounted for?	its emissions, because these carbon atoms are assumed to have nil burden when the PTL SAF is ultimately combusted.
173	Could you clarify the implications of the relaxation of additionality requirements for SAF, including: - does this mean that any existing renewable assets can be used and are they counted based on annual grid averages? -which of the scenarios in Table 4 are eligible under the relaxed rules (are 4 and 5 still relevant)? - is this relaxation of rules temporary for the LCFF project period and once the plant is operational and we want to benefit from SAF certificates, will the criteria outlined in the technical RTFO and SAF Mandate Technical Guidance be reinstated and to be eligible the feedstock electricity supplied would need to meet the additionality criteria? -Do the same 30 min temporal correlation requirements apply; section 4.39 permits longer periods where real-time figures are used, but if annual grid averages are used, should these be every 30 min? - do grid congestion requirements apply? -presumably the calculation of grid losses still applies? -what would be expected under a PPA agreement - guarantee of supply of renewable electricity to the project covering the first year of operation or more? - for point 4.38, is the table provided in the call guidance on pg 26 considered a reliable source whereby, for example in year 2031, 77% of grid electricity is eligible? - for a completed 1st year of operation in 2031 where the eligible grid fraction represents 77% and in consideration of the 90% for eligible feedstock electricity, does that mean that up to 43% of the electricity can be supplied from the grid generally, and the remaining 57% from dedicated renewable supply? - do the rules change if, after completion of the demo period, the plant changes to a small FOAK plant.	Please see Question 105 from the launch webinar FAQs. This is not a relaxation in SAF Mandate policy or requirements. This is only an evidence simplification for the purposes of the LCFF (as was the case for the AFF competition). - If your project plans to use existing wind/solar/hydro/geothermal/tidal/wave or nuclear assets, please follow the SAF Mandate Technical Guidance, and apply the relevant location/year grid intensity when submitting your Appendix H workbook. If your project plans to use wind/solar/hydro/geothermal/tidal/wave assets that will meet the additionality criteria, you may apply a nil GHG intensity when submitting your Appendix H workbook. If your project plans to use nuclear assets that will meet the additionality criteria, you may apply a nuclear GHG intensity when submitting your Appendix H workbook. - All the scenarios in Table 4 of the SAF Mandate Technical Guidance are still valid. - There is no temporary relaxation of SAF Mandate rules during the LCFF period, the SAF Mandate GHG methodology continues unchanged. We presume by "to be eligible" you mean for SAF Mandate certificates - it is not a requirement to use additional renewables (Scenario 3) to be eligible for SAF Mandate certificates, as other Scenarios in Table 4 are available (e.g. Scenario 4 can still be fully eligible, just with higher GHGs). - For the purposes of applying for the LCFF, use annual GHG intensities relevant to your project. Do not provide 30 minute data, as this is only relevant during plant operations. - Regarding grid congestion, we are unclear about the question. SAF Mandate Technical Guidance requirements will apply during plant operations, so your LCFF application should show how these are likely to be met. - Regarding grid losses, these are already included in the projected annual grid GHG intensities (if relevant) that are to be used in the LCFF Appendix H. For additional wind/solar/hydro assets, these will be irrelevant (still nil intensity). If sourcing nuclear power, ensure a reasonable estimate of grid losses are included in your delivered electricity GHG intensity, and provide a reference. - There is no minimum PPA contractual evidence requirement under the LCFF, or minimum term. If your project has an MOU, HoTs or final (draft) agreement for its power supply, we encourage you to submit this as part of Appendix I. - Re point 4.38 in the SAF Mandate Technical Guidance - for the purposes of an LCFF application, if you plan to use some grid electricity, please follow LCFF Guidance Document Annex E, but noting this LCFF dataset is not valid for use under the SAF Mandate once your plant is operational. - Assuming your plant is in GB and the first full calendar year of operations will be 2031, then to meet the >90% feedstock electricity requirement for the LCFF, your LCFF application should evidence that at least 57% of your first year feedstock electricity is likely to be sourced from wind/solar/hydro/geothermal/tidal/wave or nuclear assets (Scenarios 3-5), and that at most 43% of your first year feedstock electricity would be sourced from the GB grid average (Scenario 1). Appendix H workbooks and Appendix E will need to match the different consignments generated. We note the renewable supply does not need to be "dedicated" as in private wire. - There is no "demo period" within the LCFF, nor is there a definition of "small FOAK". Our interpretation of your question is that you might be planning to build a plant that is initially run sporadically as a demonstration, but then after a number of years, is then chosen to run at high load factors as a FOAK commercial plant. If this is your

		business model (e.g. as set out in Appendix E, due to raising debt & equity for FID, and expecting to make a profit over the lifetime of the plant), this plant will be interpreted as a FOAK commercial plant, and the <31gCO ₂ e/MJ LHV SAF threshold will be applied in the first year of operations - not the higher demo GHG threshold. DfT will determine whether your proposed plant is a demo or FOAK plant.
174	We have a question regarding footnote 3 of the LCFF Guidance Document concerning intermediate fuels used to produce SAF. We are currently developing a hybrid project in the UK to convert eligible biomass and blue hydrogen into alcohol. Given that our project uses both eligible and ineligible feedstocks to produce the intermediate alcohol fuel, would this project be partially eligible for the LCFF, if all other requirements are met?	A project that uses both feedstock blue hydrogen and feedstock biomass will not be eligible for the LCFF, even if the criteria within LCFF Guidance Document Footnote 3 are met. This is because there are non-waste fossil feedstocks being used to make the intermediate fuel – see footnote 13. At best, UK alcohol to jet facility could apply alone and purpose only sourcing the eligible biogenic alcohol from your plant (via mass balance principles), provided there is evidence provided that the remaining alcohol will be sold elsewhere as purely fossil-derived, but your alcohols project will not be able to claim for development costs under LCFF.
175	Query re eligible costs for the LCFF window. We were wondering if professional fees (legal fees/land agent fees) associated with negotiating and contracting for exclusivity / option agreements on potential plant sites are eligible costs. We understand purchase and land lease costs are ineligible as well as any exclusivity or option payments, but the guidance does state that addressing legal issues and plant site identification are eligible and the FAQs state that a site selection exercise would also be eligible (FAQ 65).	Land exclusivity/option agreements and the associated legal/land agent fees to pursue these are not eligible.
176	Site work - Annex C describes Feasibility as the stage where 'several possible locations for the plant will have been evaluated at high level' with a specific location identified during Pre-FEED. However Annex D lists 'plant site identification and review' as an eligible activity. Please confirm the distinction: is multi-site screening/selection deemed Feasibility, while detailed identification and review of a preferred site (e.g. site surveys, utilities and logistics review) is eligible Pre-FEED work? Where does the limit fall?	As per LCFF definitions, Feasibility ends and Pre-FEED starts at completion of a Class 5 cost estimate. Pre-FEED ends and FEED starts at completion of a Class 4 cost estimate. The Annex D outcomes given are typical (not prescribed) outcomes that could be expected to have been achieved by the end of each lifecycle stage. Plant site identification and review is an eligible cost under LCFF, and would likely fit within Pre-FEED. DfT would typically expect projects to have at least a long-list of potential sites by the completion of Feasibility, but this is not an eligibility check.
177	Evidence that feasibility is complete - what evidence do you require at application to demonstrate the Feasibility stage is done, so that proposed work is accepted as Pre-FEED rather than Feasibility? For example would a completed feasibility study report with options appraisal, heat and mass balance and a Class 5 CAPEX/OPEX estimate suffice? Does this need to be submitted with the application?	A Class 5 CAPEX/OPEX estimate will suffice, backed up by matching heat and mass balances for your chosen option. You should submit this as part of Appendix I to evidence your current project status. You may also include a full Feasibility report and options appraisal and project charter.

178	Is an in-house feasibility study acceptable or do you expect third-party studies or contracts for their delivery (per the 'Engineering studies' evidence item)?	Feasibility studies are not eligible for the LCFF. However, the more general point is that any eligible engineering design work can be carried out in-house or by third parties, provided there is evidence of the expertise and capacity.
179	Work spanning the boundary - several Annex D eligible activities (e.g. strategy work and technology configuration appraisals, feedstock availability assessments, economic assessments) could occur in either stage. Where a work package spans the boundary (e.g. finalising an options appraisal or refining feedstock assessments early in Pre-FEED), how should costs be apportioned between eligible and ineligible activities in the cost breakdown?	By "spanning the boundary", we presume you mean between Feasibility and Pre-FEED. All costs incurred before completion of a Class 5 cost estimate for your chosen technology pathway will be ineligible, as this is LCFF definition of where Feasibility ends and Pre-FEED concurrently starts.
180	Work spanning the boundary - is the test the lifecycle stage the activity supports (i.e. maturing the design from a Class 5 towards a Class 4 AACE estimate) rather than the activity type itself)?	See Question 179. The activity type also matters if this is ruled out as ineligible, even after a Class 5 cost estimate is completed.
181	Does DfT have a minimum annual SAF production capacity that it uses to define a commercial plant?	No, there is no minimum capacity. Evidence for whether a plant is deemed commercial should be supplied in Appendix E (i.e. is it profitable, with sufficient returns for the equity and debt providers)
182	Does DfT have a minimum operating profit that it uses to define a commercial plant?	No, as this will depend on the funding structure for that specific plant. DfT will however generally expect positive values for NPV and equity IRR.
183	What tests does DfT use to determine whether a SAF plant is considered to be commercial or demonstrator? For example, plant profitability, credibility, technology readiness, ability to proceed?	Technology readiness would be the current TRL, and not an indicator of a future plant's status. Similarly, the ability of a project to proceed with funded activities is not an indicator of the future plant's status. The strongest indicator of whether a plant is a FOAK commercial plant will be the Appendix E financial metrics, as well as the plant capacity, planned operating regime, offtakes, technology guarantees etc - there are a number of different factors that DfT will take into account.
184	Does DfT have a target operational date for commercial plants that are close to FID	No
185	Can you confirm if technology license fees are an eligible cost - from the guidance notes it appears not during this phase but we would like to check.	Technology licence fees are an eligible cost during Pre-FEED and FEED. They are not eligible during Detailed Design.
186	The overhead value is indicated up to 40%, are we able to apply out standard overhead value to salaries, does this include contractors or only FTEs?	Overhead values on top of own staff salaries are capped at 40%. If your standard overhead value is smaller than this, please apply your value. It is assumed that the rates that you will be paying to your subcontractors already include their overheads, and therefore no further overheads are to be included on subcontractor rates. Each subcontractor will also have to evidence their overhead values on top of own staff salaries are capped at 40%.
187	Can you confirm if the deadline is 21st September at 4pm? In one of the figures in the guidance notes it indicates the 11th September but I assume that is an old date.	The deadline is 21st September 2026. Figure 2 of the LCFF Guidance Document will be updated to align with this.
190	Are we allowed to use hyperlinks to provide references for our responses to questions in either the application form or the appendices? Are these hyperlinks allowed to be included	"You should not provide external hyperlinks to any further material beyond your application form and appendices, as these linked webpages or external documents will not be reviewed. If you wish information to be read by the assessors and DfT, this must be included within the application form and appendices themselves.

	as foodnotes or should they be included in the main body text of the application form?	If you wish to provide an internal hyperlinked cross-reference to another question response in your application form, or to a page in one of your Appendices (if you have a method of linking in to other documents in your bundle), this is actively encouraged. We would recommend using a common format such as ""[LINK]"" immediately after you give the relevant Question number or page number of the relevant Appendix."
191	Eligibility requirements - we are a UK-registered, exempt charity (non-profit organisation) and we are considering submitting an application as the lead applicant. The project is intended to support the development and demonstration of a technology for low-carbon fuels, with a clear pathway towards commercial deployment. Could you please confirm whether our organisation, as an academic entity, is eligible to lead an application to the LCFF call? Our intention is to establish a dedicated UK limited company to take forward the technology and its commercialisation. Depending on the requirements and timing, this company could potentially be incorporated either before the application deadline or shortly thereafter, with our organisation initially leading the application and supporting the establishment of the company. We would appreciate any guidance on whether this proposed structure would be compatible with the call's eligibility and funding rules.	Yes, UK registered charities, including universities are eligible to apply. Please see the responses to Questions 84-85 of the FAQ pre-populated responses.
192	For the >50% jet product-slate eligibility criterion, can you confirm that the denominator comprises fuel products from the SAF conversion process and excludes non-fuel material co-products such as ash recovered carbon black and recovered steel?	Correct, as per footnote 4 of the LCFF Guidance Document, non-fuel co-products such as carbon black and steel are excluded from the denominator. The denominator includes any fuel outputs that exit the system boundary for the eligible section of the pathway (FT waxes and pyrolysis waxes are treated as an intermediate fuel and would be counted). If your eligible intermediate plant is selling e.g. 20% of the intermediate fuel elsewhere and 80% is going to the eligible upgrading facility, then 20% would be included on the denominator along with the upgrading facility fuel outputs (the 80% would be ignored as this is internally consumed). If the intermediate fuel plant is ineligible due to partial use of ineligible feedstock, but is mass balancing so only the eligible fraction of the intermediate fuel is sent for upgrading in an eligible LCFF facility, then only the LCFF facility fuel outputs will be included in the denominator. Your question indicates your feedstock may be end-of-life tyres. If so, the fossil fraction is not an eligible feedstock so please read Q12 of the FAQ pre-populated questions. If you are proposing to mass balance biogenic tyre pyrolysis oil (TPO) to achieve an eligible TPO production facility, but ineligible TOP production, then the coproducts of this TPO production facility would not be considered within the product slate denominator anyway. If you have any doubts regarding your product slate calculation of pathway eligibility, please email the mailbox.
193	Our project will incur several upfront payments to the technology licensor early in the FEED phase. These costs include the licensor's FEED engineering package, as well as license-related payments that are required to progress the	Please see the response to Question 185.

	engineering design and support advancement towards FID. Having reviewed the competition guidance, we note the reference to EPC licence fees being ineligible for support.	
194	As currently structured, the available funding is split between: £30 million in Window 1 and, £63 million in Window 2 Our project expenditure profile is expected to ramp up over time, with a significant proportion of engineering activity occurring during the later stages of the programme (window 2). As a result the majority of our FEED deliverables and associated costs are likely to fall within the later funding window. Given this profile we are keen to understand whether the LCFF provides flexibility to accommodate upfront payments required by technology licensors at the start of the project, even where the associated engineering activities and deliverables extend into later stages of the programme. This would help align grant funding with the project's actual spend profile and development needs. Whilst we can negotiate with the technology license to lower these costs as much as possible, we expect that there will still be a request for some upfront payment.	Please see the responses to Questions 108 and 141.
195	On the costs eligible for grant support for LCFF Funds, could you confirm whether costs in support of going through the ASTM approval process for a new SAF pathway would be eligible or ineligible for grant support? (Engineering work, data collection, fuel testing etc).	Engineering design work relevant to the LCFF plant will be eligible, but engineering work such as construction or commissioning will not be eligible. Fuel testing, data collection and analysis can be eligible if shown to be directly relevant to the design of the proposed LCFF plant. Please also see the response to Q66 of the pre-populated FAQs. The UK SAF Clearing House could be a potential avenue for this testing, as it also offers expert support, although it is not currently allocating grant funding for testing.
196	Can you please confirm/advise the requirements for the Class 5 standard estimate. Does this need to be carried out by a third party contractor, or can the applicable submit their own? I have a detailed estimate of the project in question, but this has been done 'in house' using vendor supplied information and BOP assumptions.	This estimate can be carried out in-house or by an external party but must be able to evidence adherence to the AACE cost estimation methodology, or an equivalent, and must be able to show evidenced breakdowns of CAPEX and OPEX estimates, with uncertainties quantified as being within the Class 5 maximum limit boundaries (-50% to +100%). This Class 5 cost estimate must also match the chosen pathway and heat & mass balances developed during Feasibility.
197	Can you confirm if technology license fees are an eligible cost – from the guidance notes it appears not during this phase. We will be engaged in FEED activities during the funding period.	Please see the response to Question 185.

198	The overhead value is indicated up to 40%, can we apply our standard overhead factor of 20% with justification.	Please see the response to Question 186.
199	Can I also confirm the deadline is 21 st September at 4pm? In one of the figures in the guidance notes it indicates the 11 th September.	Please see the response to Question 187.
200	Regarding the RCM and given we will not have a value for the strike price or floor price until end of 2026, how should we include this in our financial modelling?	Please estimate what a potential RCM strike price might be, and justify any assumptions made, including your lifecycle GHG emissions. We would suggest following the latest guidance from DfT: https://www.gov.uk/government/publications/sustainable-aviation-fuel-saf-revenue-certainty-mechanism-contract-allocation-strategy
201	During AFF, our subcontractor completed a Basic Engineering Design Package for a syngas plant, including the balance of plant. The sub-contractor is now unable to meet our Commercial Operation Date for one of the key components. We are therefore pivoting to a more established syngas generation technology. The sub-contractor have offered to re-work their stack design to feed this more established syngas generation process, and have offered to do this re-work at their own cost. If this work is completed during the LCFF funding period, could it be counted as match funding in our application?	In principle, yes, provided this stack re-design work is necessary, it is included within the project activities (i.e. there is a milestone that will be contingent on evidence of this match funding having occurred), and the sub-contractor is involved as project partner in your LCFF application. DfT will also want reassurance that LCFF funding would not be going towards these re-work activities, and how the sub-contractor plans to minimise the time and costs of this re-work (given prior AFF engineering) so that the match funding value is not artificially inflated.
202	Once the current competition process has concluded, will there be an opportunity to engage with the appropriate DfT team regarding future funding routes for physical FOAK deployment and commercial demonstration? If so, what is the best way to achieve this? For example, would their match funding be included in the match funding amount, or would we list them as a separate partner organisation in section 1.3 of the application plus in Appendix D? What is the best way to evidence the value of the match funding? Would an estimate of person-hours plus associated value, in a signed letter from the sub-contractor be sufficient?	The DfT LCF Delivery Unit are always available to field questions regarding the SAF Mandate, and there are separate teams within DfT regarding policy and the RCM. If an organisation is providing match funding, we would typically call this a project partner, rather than subcontractor who would only be paid for services delivered (and provide no match funding). All LCFF funds go via the lead organisation in an event. If an organisation is providing match funding, we recommend listing them in section 1.3 and Appendix D, with a letter of support or (draft) subcontract evidence of their involvement in Appendix I. An estimate of person-hours and rates (bearing in mind overhead rules etc) would be the minimum required to back up the financial estimate of the match funding, and should be broken down in Appendix D by milestone.
203	We will be submitting 6 files for Appendix H to represent 6 different consignments (methanol feedstocks) however, some of the suppliers are struggling with their ability to share detailed plant information (e.g. catalyst consumption, electricity consumption, biomethane conversion efficiencies) due to confidentiality limitations. In these cases what would you recommend for filling out the upstream tabs (Feedstock Collection – pre-processing)? We have the overall carbon	Submission of 6 Appendix H files is perfectly acceptable, given the different methanol sources. If your FOAK plant is only focused on pre-FEED, or your plant is a demo, there is an option in Appendix H to select that you do not have upstream data, and instead input a delivered methanol GHG intensity into your Conversion to jet tab. However, if your FOAK plant application will include FEED activities, this option is not available, and upstream data is expected. Ideally, this upstream data would be sourced from the individual suppliers you intend to use, during current contractual negotiations, as audit of this detailed upstream data can be requested by DfT under the SAF Mandate during operations. If your project is not yet sufficiently progressed with these supplier negotiations to obtain this data, we recommend using typical values for electricity use, efficiencies etc from wider literature (see the

	intensity for biomethanol/e-methanol production that has been quoted to us but struggling with the specific plant inputs/outputs.	Assumptions tab for some helpful references), and noting most catalysts are likely to be an immaterial addition to overall emissions and if so can be ignored. If it is still not possible to fill in actual or likely upstream supply chain data, you could select "Pre-FEED" only in the Guidance tab, and submit Appendix H with the quoted delivered methanol GHG intensities, but you will lose marks on this scoring criterion due to the reduced transparency and less robust evidence. Note any delivered GHG intensities must be calculated according to the UK SAF Mandate, and not EU RED or other scheme GHG methodologies.
204	Technical clarification regarding the project financial model workbook (Appendix E) - We are currently completing the model for our proposed Demonstration plant. While filling out the 'Financing - Demo' tab, we encountered a calculation issue with the formula in Cell B10: Total uses (investment CAPEX + total EBITDA). The current formula in the cell is: =SUM('Cash flow - Demo'!F59:AI59,'Cash flow - Demo'!F56:AI56) The instructions in the "Guidance" tab note that for demonstration plants, the total uses should match the CAPEX plus EBITDA, adding that EBITDA is "(likely negative)". However, in our current modeled case, the plant generates a slightly positive cumulative EBITDA. Because the SUM formula lacks a conditional check, our positive operating profit is being added directly to our CAPEX. This inflates the "Total uses" figure required at FID, creating a large, artificial funding gap that the spreadsheet is asking us to fill with funding sources. Could you please advise on how to proceed? Specifically: Is the formula intended to capture EBITDA only if it is a negative value (representing operational losses that need to be funded)? Given our positive EBITDA, do we have your permission to override Cell B10 so that it only reflects the investment CAPEX, or would you prefer us to apply a conditional formula (e.g., only adding the EBITDA if it is < 0)?	Thank you for flagging this issue, we have reissued Appendix E as v3.0 with the necessary correction, please ensure you use this new version in your application. The Total uses formula in cell B10 should be using the most negative point of the cumulative free cash flow trajectory, as this is the maximum amount of funds that will need to be provided by the project at Final Investment Decision to build the plant (CAPEX) and to carry it through any loss-making operational period before it generates any positive post-tax free cash flow (if this ever occurs). If a demo plant is immediately profitable upon operations, the Total uses will be only the CAPEX. If a demo plant is never profitable during operations, the Total uses will be the CAPEX plus the total of the free cash flow losses over the operational lifetime. We have also corrected a separate issue in which the demo plant tax line was added to cash rather than subtracted.

205	Appendix E – are we allowed to change/expand the structure of the cashflow tab FOAK to add more SAF consignments on revenue side and similarly additional feedstock lines on the cost side, or do we need LCFF to do this?	Please go ahead and make these changes, but make a note that this has been done, and please ensure you double-check that all the revenue totals and cost totals have updated their formulae to use the new lines you have inserted.
206	Appendix E – Arrangement fees on senior debt would increase total uses of funds and as such would require increased funding via equity and debt: where can this be captured in the Appendix? Are we to amend financing or cash flow tab/do we need to ask LCFF to expand the model for that purpose?	You are correct that arrangement fees are a use of funds at financial close and must be funded by additional debt or equity. v3.0 of the workbook now clarifies this, and has made some improvements to handle this - please ensure you use v3.0 of Appendix E for your application. On the Financing - FOAK tab, under 'Amount to raise (£)' for each source, enter enough to cover both its share of plant CAPEX and its arrangement fee, and then record the arrangement fee in £ in the 'Arrangement fees (£)' column. The arrangement fees are now added to Total uses in cell B13, for the funding check reconciliation. And on the Cash flow - FOAK tab, row 125 now adds these arrangement fees on the year where CAPEX is first incurred.
207	Appendix E – DEVEX is not to be included in Financing tab or in the CAPEX section of the cash flow tab, are we to include (and if so where) DEVEX between LCFF potential win date and FID?	DEVEX prior to FID is not to be captured in Appendix E, as Appendix E is only calculating from the point of FID for all plants. Please discuss and evidence your DEVEX financing for the LCFF funding period in your answer to the Application form section 5.1.1, which focuses on the LCFF funded activities.
208	Can you please advise if the feasibility/Class 5 estimate must have been carried out by third party company, or can the applicant themselves provide this estimate detail along with supporting evidence and/or rationale?	See the answer to Question 196.
209	Partners section of LCFF application. We have partners who will provide backing for the project but aren't applying for the grant, we are applying as a sole applicant. We will provide letters from project partners confirming their involvement and support, but would it then be ok to put £0 on the section for 'what LCFF grant £ will they receive?' as they aren't part of the application. Can I also have clarification on 'what match funding £ will they provide', do you require the amount to which they have said they will provide funding? and if they aren't providing funding but are a company that we will be working with to supply say tyre chips, then we could just put £0?	Correct, if a project partner will not be receiving LCFF grant monies, put £0 for this column. If a project partner will not be providing any match funding, put £0 for that column. If a project partner is not receiving grant monies, nor providing match funding, they do not need to be included in Appendix D.
210	In the previous call for pre-FEED (AFF3), we were asked to limit (combine) payment milestones (and group deliverables) to 4 or 5. Do you have any preferences for the number of payment milestones under this call?	See the answer to Question 35.
211	The project will be using a liquid biogenic intermediate at the plant boundary sourced from 3rd parties. Sustainability	See the answer to Questions 47 and 203. Please do not overwrite formulae in Column W of the Appendix H workbook. Anonymised suppliers, and incomplete mass & energy flows, will likely lose marks due to reduced

	certification and a CI is available for each delivered intermediate, from multiple suppliers. An Appendix H will be submitted for each intermediate with full chain of custody information populated into Column 'W' of Appendix H for each supply chain step starting from the original eligible feedstock. These 3rd party suppliers are already in operation producing the liquid biogenic intermediate and are not partners in the application and are not seeking LCFF funding. To protect the commercial confidentiality of these suppliers, the mass or energy flow from each input and CI of each input, will be anonymised by the applicant. The value in Column 'W' of Appendix H will remain accurate and will match the suppliers sustainability certification. This is consistent with applicants experience using Appendix H in AFF Window 3.	transparency and less robust evidence. DfT will also require evidence regarding the share of jet consignments from each different biogenic intermediate. Note any delivered GHG intensities must be calculated according to the UK SAF Mandate, and not EU RED or other scheme GHG methodologies.
212	From the guidance document, it is understood that joint applicants should have clear demarcation and replicated budget tables etc. It is also understood from the Grant Management Agreement Draft that, should a grant be awarded, only the lead applicant would be a signatory. Can you please clarify if this means that the lead applicant is legally responsible for the joint applicant's delivery? If the joint applicants are successful, would the monitoring officer interact independently with the non-lead applicant?	See the answer to Question 2. You are correct that DfT will only be signing a Grant Funding Agreement with the lead applicant, who will then be responsible for the delivery of the agreed programme of work from that application, including management of partners and subcontractors. One Monitoring Officer will be appointed per successful application, and they will typically liaise only with the lead applicant, but other project parties may also frequently be part of meetings with the lead applicant and the monitoring officer.
213	Appendix I is required to be developed as a single pdf that includes evidence of various documents including commercial agreements. If we were to include all documents in their full form, that would make this appendix thousands of pages long. Can you clarify if it would be sufficient to only include the first few pages of some documents (e.g. process safety studies) to demonstrate their existence - e.g. cover page, content list, executive summary? Similar question for contract documents where individual files can run into hundreds of pages.	Yes, this is acceptable for studies/contracts that are not critical to the delivery of planned LCFF activities. Please be clear where you have truncated any documents, and allow the full versions to be made available on request. Alternatively, you can set up your Appendix I pdf to have chapters, where the assessors can skip to the correct section for review.
214	Clarification around the extent to which a TRL 6 technology progressing towards a UK FOAK deployment can use Window	This question is not entirely clear, but provided the eligibility criteria including the project lifecycle definitions, match funding and eligible costs are met, these Pre-FEED, FEED and Detailed Design activities could be eligible for

	1 support for activities such as Pre-FEED, FEED, detailed engineering and SAF qualification-related work, where the subsequent physical construction and commissioning would be funded separately.	LCFF support. Regarding SAF qualification work, please see Question 195. Note there is no requirement for construction and commissioning to start during the LCFF funding window, and these activities are ineligible in any event, so cannot be claimed for support, nor proposed as match funding.
215	In the project financials spreadsheet, when filling out the project costs, it gives a number of columns for costs per 'organisation'. We are submitting our application as the only applicant, but have several suppliers that make up the project team as such, should we be including suppliers under 'organisation' or just ourselves?	If any organisation is providing match funding, they ought to be listed as a project partner in Section 1.3 of the application, and therefore also included as an Organisation with their own column of data in Appendix D (the LCFF activities budget). If an organisation is just a subcontractor (not providing match funding), and their scope/budget is not yet fully confirmed, or tendering will be occurring to select a subcontractor, we recommend these costs remain under the Lead Organisation in Appendix D. If a subcontractor has already been selected and has a confirmed scope & budget, we would recommend splitting these costs out into a new Organisation column in Appendix D, and also including this organisation as a new row in Section 1.3, to enhance transparency - particularly if this subcontractor will be given a material share of the LCFF grant monies. For the avoidance of doubt, in Section 1.3, the LCFF grant monies that the Lead applicant will receive is meant to be the net amount after paying partners & subcontractors.
216	Hydrogen as a precursor - under the SAF Mandate technical guidance, we understand that hydrogen used directly in the production of synthetic hydrocarbons from CO/CO ₂ may be considered a chemical precursor. Our proposed hydrogen is introduced into the FT synthesis stage and is chemically incorporated into the hydrocarbon product, increasing carbon conversion and the resulting SAF yield. Is there any basis under the SAF Mandate for treating such hydrogen as a process input rather than a chemical precursor where its primary function is to provide the hydrogen required to optimise the stoichiometry and conversion of an existing MSW-derived syngas stream? If the answer is no, we would appreciate confirmation that the hydrogen must instead be assessed as a precursor and that its originating feedstock must therefore satisfy the applicable eligibility requirements.	Hydrogen will be considered a process input if used to upgrade the long-chain hydrocarbons that result from the FT step (e.g. converting FT waxes or fuel length alkenes into jet). If your hydrogen is input to the front-end of the FT stage, i.e. combined with the existing MSW-derived syngas to boost the H ₂ :CO ratio, this hydrogen will be considered an intermediate feedstock, and will create its own consignment (separate to the biogenic MSW and fossil MSW consignments), and the original feedstock used to make this hydrogen must follow the LCFF eligibility rules.
217	Methane pyrolysis and solid carbon: The proposed hydrogen production route is: CH ₄ → C(s) + 2H ₂ rather than methane reforming. Subject to independent verification, the technology is expected to retain the majority of the methane carbon as a stable solid-carbon product rather than emitting it as CO ₂ . Can hydrogen produced through methane pyrolysis be considered eligible for SAF production where the hydrogen production pathway demonstrably meets the UK	Meeting the Low Carbon Hydrogen Standard is not a requirement of the LCFF. The methane feedstock must meet the LCFF eligibility rules, i.e. must be traced back the original feedstock that created the methane, and this cannot be fossil natural gas. For example, biomethane from eligible waste/residues could be suitable, provided wider SAF Mandate sustainability and chain of custody rules are met. The GHG intensity of the hydrogen will impact the SAF GHG intensity, which could also have eligibility implications. We note that a pathway that goes from original feedstock to methane to hydrogen to SAF will have multiple steps and efficiency losses (given full extraction of C atoms before reintroducing a source of CO ₂), all of which will need included in Appendix H. If using methane pyrolysis, it is possible to claim a sequestration credit for solid carbon if evidence of suitable sequestration is

	Low Carbon Hydrogen Standard and the resulting SAF meets the applicable lifecycle GHG and sustainability requirements? We would particularly welcome guidance on whether the origin of the methane determines eligibility, or whether the demonstrated lifecycle characteristics of the hydrogen and resulting fuel are determinative.	provided (see C.46, D.20 or E.9 of the RTFO & SAF Mandate Technical Guidance, depending on the feedstock/resulting consignment type). Note that the pathway technology choice must meet the TRL eligibility criteria.
218	Biomethane as the methane feedstock: Our preferred configuration would use biomethane rather than natural gas as the methane feedstock. If the methane used for pyrolysis is demonstrably biomethane meeting the relevant sustainability and chain of custody requirements: would the resulting hydrogen be capable of being treated as an eligible renewable/low-carbon precursor for an RCF/FT SAF pathway? We would also welcome confirmation of whether this treatment differs between the SAF Mandate, the LCFF and the future SAF Revenue Certainty Mechanism.	The biomethane would be treated as an intermediate fuel, so it will be the original feedstock that generated the biomethane that has to evidence it meets the LCFF eligibility rules. This chain would result in the production of biogenic SAF, not a Recycled Carbon Fuel (RCF) SAF. There are some additional eligibility rules for biomethane under the LCFF compared to the SAF Mandate, e.g. the original feedstock must not be subject to the SAF Mandate's HEFA cap. We cannot yet provide details of the eligibility criteria for the first round of RCM contract allocation, SAF AR1. These will be published in the RCM Applicant Guidance when the round is launched. DfT intends to ensure that SAF supported by the RCM is eligible for certificates under the SAF Mandate.
219	Biomethane supplied through the GB gas network - the project is considering sourcing an equivalent quantity of biomethane through a contractual/mass-balance arrangement, with physically interjected biomethane potentially entering the GB gas network at a different location. We understand that the January 2026 Low Carbon Hydrogen Standard permits biomethane to be sourced through the gas grid using a mass-balance approach. Would DfT recognise the certified biomethane attribute under such a mass-balance arrangement when determining the eligibility of hydrogen subsequently produce through methane pyrolysis for use as a SAF precursor? Or would eligibility require the physical biomethane molecule to be present at our site and used directly in the hydrogen production process?	The Low Carbon Hydrogen Standard rules do not apply to the LCFF - the SAF Mandate rules regarding chain of custody apply to LCFF. Please use the chain of custody rules set out in the "RTFO Guidance for biomethane, including as a chemical precursor" document, which also applies to the SAF Mandate: https://www.gov.uk/government/publications/rtfo-biomethane.
220	We would also welcome DfT/LCFF's view on ATR, ATR+GHR and other non-electrolytic low-carbon hydrogen production routes, where the resulting hydrogen can demonstrably meet the Low Carbon Hydrogen Standard, but the underlying energy/feedstock source is not renewable electricity. Our immediate objectives are to establish eligibility under the UK SAF mandate, eligibility for the SAF Revenue Certainty Mechanism/Support Mechanism where applicable, eligibility	See the responses to Question 217 & 218. There are several LCFF eligibility criteria that could be relevant to your question, but many of these come back to the eligibility of the original feedstock (which is not given in the question), as the feedstock determines the consignment type and the GHG methodology to follow. If you have an eligibility question about a particular feedstock (noting it will be for an applicant to evidence their compliance with the feedstock, product slate, jet quality, TRL range and GHG intensity threshold eligibility criteria), please email the mailbox.

	and treatment under LCFF and the appropriate lifecycle GHG accounting treatment. We are not seeking to prejudge the outcome. We simply need sufficient regulatory clarity to ensure that the hydrogen configuration incorporated into our FEL II design is both technically and commercially viable.	
221	Can a partner be from outside of the UK?	LCFF project partners, or subcontractors do not need to be based in the UK, but the economic benefits section of your application should also make clear the distinction between UK vs overseas benefits arising from your project.
222	Can I confirm if Section 1.4 needs to be filled out with the subcontractors that are included in Section 1.3? Also, does each supplier need to provide us with a letter of support, as per the Appendix A instruction for all partners to provide a LoS?	Yes, Section 1.4 needs to be completed with the details of any organisations listed in Section 1.3. And yes, letters from all proposed project partners confirming that they have agreed to be part of the consortium/alliance/partnership that will implement this project are required. Subcontractors do not have to provide a letter of support, but it is recommended they do so, particularly if they are completing a significant share of the activities.
223	TRL - clarification on how the minimum TRL requirement will be assessed where an applicant is proposing an integrated process in which the constituent technologies are at different levels of maturity. In particular our gasification system has been developed and tested at pilot scale, while the next development stage is intended to integrate Chemical Looping with the gasification process and subsequently interface the conditioned sngas with commercially established Fischer-Tropsch technology. Would the TRL assessment: a) consider the maturity of the individual principal technologies separately; b) assess the maturity of the complete integrated gasification / Chemical Looping / Fischer Tropsch process as a single system; or c) allow an applicant to demonstrate TRL 5 on the basis of the existing core conversion technology while using the LCFF-supported Pre-FEED/FEED programme to engineer the subsequent integrated TRL 6 demonstration facility?	Please see Question 39. The TRL assessment will look at the evidence for the individual principal technologies and derive a combined pathway TRL. Many developers will only have pilot plants for individual components, and many will not yet have end-to-end pathways where a single site has each component interfacing with the next and recycles & heat recovery are optimised. If your proposal is to integrate chemical looping within your gasification technology, this is a different method of heat & oxygen supply to standard gasification, and this chemical looping is not a separate component in the pathway, so evidence regarding the current TRL of chemical looping gasification will be required (particularly with the proposed feedstocks). Finally, the current TRL will be assessed at the point of application, and not based on LCFF planned activities.