

## Challenges in Quantifying Greenhouse Gas Impacts of Waste-Based Biofuels in EU and US Biofuel Policies: Case Study of Butanol and Ethanol Production from Municipal Solid Waste

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Challenges in Quantifying Greenhouse Gas  
Impacts of Waste-Based Biofuels in EU and US  
Biofuel Policies: Case Study of Butanol and  
Ethanol Production from Municipal Solid Waste

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## 2 Abstract

3 Conversion of wastes to biofuels is a promising route to provide renewable low-  
4 carbon fuels, based on a low- or negative-cost feedstock whose use can avoid  
5 negative environmental impacts of conventional waste treatment. However, current  
6 policies that employ LCA as a quantitative measure are not adequate for assessing  
7 this type of fuel, given their cross-sector interactions and multiple potential  
8 product/service streams (energy, fuels, materials, waste treatment service). We  
9 employ a case study of butanol and ethanol production from mixed municipal solid  
10 waste to demonstrate the challenges in using life cycle assessment to appropriately  
11 inform decision-makers. Greenhouse gas emissions results vary from -566  
12  $\text{gCO}_2\text{eq./MJ}_{\text{biofuel}}$  (under US policies that employ system expansion approach), to +86  
13  $\text{gCO}_2\text{eq./MJ}_{\text{biofuel}}$  and +23  $\text{gCO}_2\text{eq./MJ}_{\text{biofuel}}$  (under initial and current EU policies that  
14 employ energy-based allocation), relative to gasoline emissions of +94  $\text{gCO}_2\text{eq.}$  LCA  
15 methods used in existing policies thus provide contradictory information to decision-

16 makers regarding the potential for waste-based biofuels. A key factor differentiating  
17 life cycle assessment methodologies is the inclusion of avoided impacts of  
18 conventional waste treatment in US policies, and their exclusion in EU policies.  
19 Present EU rules risk discouraging the valorisation of wastes to biofuels, and thus  
20 forcing waste towards lower-value treatment processes and products.

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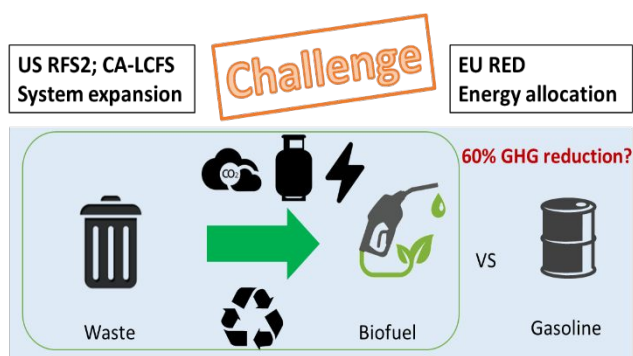
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25 **Graphical abstract**

26



## 27 1 Introduction

28 Liquid biofuels can play a key role in the decarbonisation of the transport sector, and  
29 have been studied extensively with life cycle assessment (LCA) tools to quantify their  
30 net contribution to addressing greenhouse gas (GHG) emissions associated with  
31 conventional, fossil fuels. LCA methodologies have been developed as a quantitative  
32 element of transport fuel policies globally, wherein they are used to determine a fuel's  
33 eligibility (US Energy Independence and Security Act; EU Renewable Energy  
34 Directive) or to calculate its contribution to reducing emissions related to fuel use (e.g.,  
35 California Low Carbon Fuel Standard). The development of waste-based fuels has  
36 received significant attention as they can avoid land use implications of crop-based  
37 biofuels (e.g., carbon stock reductions in biomass and soil pools; biodiversity impacts)  
38 while also contributing to waste treatment objectives in the perspective of a more  
39 circular economy. However, waste-to-energy systems are complex in view of their  
40 multi-functional nature: they provide a waste treatment service and can produce a  
41 diverse range of material and energy co-products, as well as the primary liquid fuel

42 product. LCA frameworks employed in existing policies which were developed to  
43 principally consider crop- and agriculture/forestry residue-based biofuels. These  
44 approaches face challenges in evaluating biofuels produced from more complex,  
45 mixed waste feedstock streams and in accounting for interactions between the waste  
46 treatment and energy sectors.

47 LCA plays a central and quantitative role in global policies aimed at reducing GHG  
48 emissions of transport fuels. In the EU, the Fuel Quality Directive regulates a minimum  
49 of 6% reduction of the life cycle GHG intensity of transport fuels by 2020 compared to  
50 2010 level, which can be achieved through the use of biofuels as one means.<sup>1</sup> In order  
51 to be considered as renewable biofuels, life cycle GHG emissions must be at least  
52 50% lower than from the fossil fuel they replace and 60% for newer installations from  
53 January 2018. Similar thresholds are present in US policy: the Energy Independence  
54 and Security Act (EISA) requires biofuels to achieve a life cycle GHG reduction  
55 threshold as compared to a 2005 petroleum baseline for different types of biofuels  
56 (e.g., 60% reduction for cellulosic biofuel, 50% reduction for advanced biofuel from

57 renewable biomass, and 20% reduction for conventional biofuels). Low Carbon Fuel  
58 Standards (LCFS), which have been implemented in California and other North  
59 American jurisdictions,<sup>2, 3</sup> employ a GHG-intensity target to encourage low-carbon  
60 transport fuels.

61 LCA-based biofuel policies differ substantially in their life cycle GHG emission  
62 calculation methodologies, which has substantial impact on the assessed GHG  
63 emissions of fuels. Prior studies have demonstrated how LCA study factors, including  
64 definition of system boundaries, co-product allocation methods, and selection of  
65 functional units, can return very different results for the same feedstock/fuel pathway.<sup>4-</sup>

66 <sup>10</sup> The EU RED and FQD policies are based on an attributional LCA methodology,  
67 which attempts to isolate the impact of fuel production and use from connected  
68 systems. Where fuel production processes result in multiple outputs, environmental  
69 impacts are allocated between the primary fuel product and co-products on an energy  
70 basis,<sup>11, 12</sup> and therefore the broader impacts of fuel production on co-product markets  
71 is not considered. Numerous prior studies have evaluated biofuels using the EU

72 methodology and have identified that this approach risks underestimating the  
73 environmental benefit of biofuel systems by ignoring co-product use and  
74 corresponding displacement of production elsewhere (e.g.,<sup>7</sup>), particularly if co-  
75 products do not have an energy content and therefore cannot be allocated an  
76 environmental impact under the prescribed allocation method.<sup>13</sup> This limitation is  
77 particularly relevant for waste-based biofuels, the production of which may encourage  
78 recovery of materials with no energy content (e.g., scrap metal and/or glass for  
79 recycling). Further, wastes are attributed zero GHG emissions;<sup>11, 12</sup> as such, avoided  
80 emissions due to diverting wastes from conventional treatment routes (e.g., landfill)  
81 are not credited to the biofuel product.<sup>14</sup> In contrast, the US EISA and North American  
82 LCFS policies employ a partially consequential LCA methodology that aims more to  
83 evaluate the change in GHG emissions arising from adoption of alternative fuels.  
84 These policies employ system expansion to deal with multiple products, wherein the  
85 primary fuel product is “credited” with avoided emissions by assuming that co-products  
86 would displace production elsewhere in the economy. Further, benefits of avoided



87 waste treatment processes, such as landfilling, are also credited to the biofuel product  
88 (e.g.,<sup>15</sup>). With credits from co-products considered, biofuels can in some cases be  
89 attributed with negative emissions: credits from co-products exceed the total  
90 emissions associated with producing and using the fuel (e.g.,<sup>16, 17</sup>). Such results can  
91 be misleading, as the assessed biofuels do not achieve an absolute reduction of  
92 atmospheric GHGs, but rather a relative reduction in GHG emissions considering the  
93 production displaced by co-products. For waste-derived biofuels, such distortions may  
94 be amplified given the potential for a wider range and greater quantity of co-products.  
95 Overall, while existing policies on the surface have similar GHG emissions thresholds,  
96 fuel eligibility is dependent on the specific assessment methodologies employed.  
97 Ultimately, these methodologies diverge in terms of the “question” they are asking,  
98 and therefore whether fuels are evaluated in terms of the overall environmental  
99 impacts of the system producing biofuels, or a share of impacts that can be directly  
100 attributed to the fuel product in isolation.

101 Waste-based biofuels can provide policy-relevant benefits beyond provision of low-  
102 carbon transport fuels. By diverting waste feedstocks from conventional treatment  
103 routes (landfilling; incineration), the high cost of disposal by these routes can be  
104 avoided. This is particularly relevant in jurisdictions such as the UK where landfill tax,  
105 currently £91.35/tonne, or approximately \$120 USD/tonne,<sup>18</sup> greatly increases the cost  
106 of disposal by this route. Waste utilisation for fuel production can also encourage the  
107 recovery of other materials (e.g., scrap metal, plastic for recycling), and avoiding  
108 significant GHG emissions associated with landfilling biogenic wastes (e.g.,<sup>19</sup>) or  
109 incinerating plastic-based wastes (e.g.,<sup>20</sup>).

110 Specific support for waste-derived biofuels varies greatly between regions. The EU  
111 RED requires 10% renewable energy share in transport fuel consumption by 2020. A  
112 cap limiting first-generation biofuels<sup>21</sup> to 7% share indirectly supports second- and  
113 third- generation fuels from non-crop feedstocks, including waste-based biofuels.. In  
114 the UK, the Renewable Transport Fuel Obligation provides a stricter limitation on crop-  
115 based fuels and further incentivises waste-based fuels by awarding double Renewable

116 Transport Fuel Certificates (RTFC) per litre of liquid renewable fuels derived from  
117 certain waste or residue feedstocks; these credits are tradeable and have a market  
118 value of £0.18 to £0.24 per RTFC,<sup>22</sup> or approximately \$0.25 to \$0.30 USD per RTFC,  
119 thus financially supporting waste-based fuels. Under the US EISA and California  
120 LCFS, there is no specific support for waste-derived fuels.

121 Waste-based biofuel production systems are complex to evaluate due to their cross-  
122 sector interactions (waste and energy/transport sectors) and the wide range of  
123 potential co-products. In addition to producing a fuel output, any system producing  
124 biofuels from wastes may: 1) avoid current waste treatment processes; 2) enable the  
125 recovery of recyclable materials; and 3) co-produce other energy outputs (e.g., excess  
126 electricity; heat; fuels). For policies to be comprehensively informed, and for business  
127 to make appropriate decisions in response to policies, an appropriate LCA framework  
128 is needed to account for this complexity. Therefore, we have developed a case study  
129 to explore the implications of LCA methodology decisions on assessed GHG  
130 emissions and primary energy demand and to reflect on how these varying model

131 outputs are capable of answering different questions about waste-based biofuels. The  
132 case study considers a MSW to acetone-butanol-ethanol conversion process based  
133 on an autoclave mechanical heat treatment process and subsequent fermentation of  
134 the biomass fibre to liquid biofuels (butanol, ethanol) and other co-products.  
135 Alternative system boundaries and allocation approaches are applied in the context of  
136 LCA frameworks within EU and US policies. The results are compared and integrated  
137 to more meaningfully inform policymakers and industry on the net GHG implications  
138 of waste to biofuel systems.

## 139 **2 Methods**

140 In this study, we compare life cycle methodologies to evaluate waste-to-biofuels  
141 systems and consider how information from the differing approaches can help to  
142 inform decision-making. We map these methodology decisions to current and recent  
143 biofuels policies in Europe and North America to consider how LCA methodologies

144 influence the assessed GHG emissions of biofuels. A case study scenario of liquid  
145 biofuel (butanol, ethanol) production from municipal solid waste (MSW) is employed.

## 146 **2.1 LCA methodologies**

147 The overall environmental performance of converting the organic content of MSW to  
148 biofuels and concurrently avoiding current waste treatment practices is evaluated.

149 Given the wide range of potential products/co-products (energy outputs; recovered  
150 metals/glass/plastics) with diverse materials and energy market applications (see

151 Figure 1), a set of LCA methodologies are deployed to better understand how  
152 decisions on how to allocate impacts between liquid biofuel product and the energy

153 and material co-products influence results. We consider the following set of LCA  
154 methodologies:

- 155 1) US EISA / California LCFS: Avoided waste treatment processes included  
156 (credit to primary biofuel product); all co-products evaluated with system  
157 expansion (credit to primary biofuel product) (see Section 1.1.1 in SI)

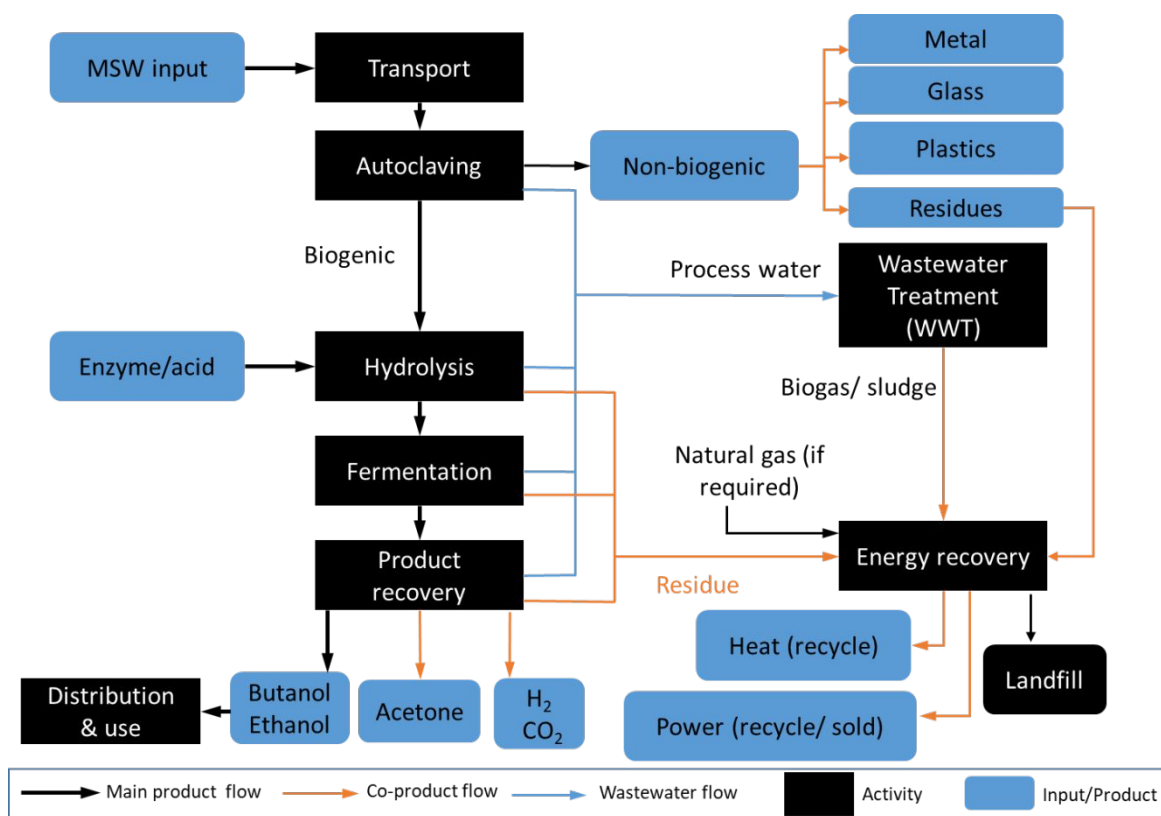
- 158           2) EU RED I (original policy): Avoided waste treatment excluded; electricity co-  
159           product evaluated with system expansion (credit to primary biofuel product);  
160           all other co-products evaluated by energy allocation (see Section 1.1.2.1 in  
161           SI)
- 162           3) EU RED II (current policy): Avoided waste treatment excluded; exergy  
163           allocation of electricity and heat co-products; all other co-products evaluated  
164           by energy allocation (see Section 1.1.2.2 in SI)
- 165           4) Mass-based allocation alternative: Avoided waste treatment may or may not  
166           be included; all co-products evaluated by mass-based allocation (see Section  
167           1.1.3 in SI)
- 168           5) Economic allocation alternative: Avoided waste treatment may or may not be  
169           included; all co-products evaluated by economic value allocation (see Section  
170           1.1.4 in SI)

171           The LCA models are developed in GaBi 8.2 using Ecoinvent 3.3 inventory  
172           databases, following ISO Standards 14040 and 14044.<sup>23, 24</sup> Two environmental

173 impacts are quantified: global warming potential (GWP), based on the most recent  
 174 IPCC 100-year GWP factors to quantify GWP in terms of CO<sub>2</sub> equivalents (CO<sub>2</sub> eq.)<sup>25</sup>  
 175 and primary energy demand (PED) in terms of MJ.

176

177



178

179 **Figure 1** Schematic representation of life cycle assessment of butanol and ethanol  
 180 from MSW.

181 The scope and functional unit LCA models are developed to evaluate the case study  
182 scenario of MSW conversion to acetone-butanol-ethanol based on an autoclave pre-  
183 treatment. Autoclave pre-treatment converts biogenic content to a biofibre material,  
184 and enables the recovery of sterilised metal, glass, and plastic materials. The biomass  
185 fibre is subsequently converted to liquid biofuels (ethanol, butanol), hydrogen, acetone  
186 via hydrolysis and fermentation, and heat/power from combustion of unconverted  
187 residual biomass material. The functional unit is one MJ of liquid biofuel (butanol and  
188 ethanol), denoted as  $\text{MJ}_{\text{biofuel}}$ . Results are also considered on the basis of 1 tonne  
189 MSW treated. A schematic process flow diagram defining the system boundaries is  
190 shown in Figure 1. The system boundaries start from the sorting and transportation of  
191 MSW. Prior energy use and environmental burdens of the processes and products  
192 that generated MSW are excluded in this study.

## 193 **2.2 Waste composition and avoided treatment**

194 The waste composition used is representative of the UK MSW with the following wet  
195 composition by mass: paper and cardboard (22%), food waste (17%), wood (8.7%),



196 plastic (22%), glass (1%), garden waste (3%), metals (4%), textiles (6.6%) and others  
197 (15.7%).<sup>26</sup> The lignocellulosic content of total MSW is 53% on the wet basis and its  
198 moisture content is 40%.

199 By diverting wastes to biofuel production, conventional treatment processes are  
200 avoided. We assume that incoming waste would otherwise be treated by incineration  
201 (71%) and landfilling (29%), based on current practices in UK.<sup>27</sup> Considerations of  
202 credits related to inclusion/exclusion of avoided waste treatment under different  
203 allocation approaches are detailed in Section 2.2. Implications of considering avoided  
204 waste treatment are discussed in Section 3.1. For landfill and incineration options, we  
205 draw on the results from the Ecoinvent database and literature.<sup>20, 28</sup> For landfill gas  
206 recovery, it is assumed that 62% of biogas is recovered (52% for energy recovery and  
207 10% for flaring) and 38% is emitted.<sup>19</sup>

### 208 **2.3 Waste – to – biofuel process**

209 The MSW-to-biofuel production process has been previously modelled based on a  
210 demonstration plant operation<sup>29</sup> and further details on the process are available in the

211 Supporting Information (SI). The system starts with the pretreatment autoclave  
212 process, based on a working facility developed by Wilson BioChemical.<sup>30</sup> MSW is input  
213 to the autoclave and treated with steam at moderate temperature (160°C for two  
214 hours). The organic content of the MSW is converted into a biomass fibre within the  
215 autoclave, which is then recovered to be used as feedstock in ABE production via  
216 enzymatic hydrolysis and fermentation. Energy recovery from unconverted biomass  
217 and biogas generated in wastewater treatment is sufficient to provide all heat and  
218 power requirements of the integrated autoclave/biofuel production process, with  
219 excess electricity exported to the grid. Recyclable material streams (ferrous & non-  
220 ferrous metals, glass, plastic, wood and textiles) are sterilised within the autoclave and  
221 separated from the output stream for subsequent material recovery. All remaining  
222 material is classed as waste and sent to incineration/landfill at the same proportions  
223 as current waste treatment (see Section 2.2).

224 Biogenic fibre derived from MSW differs significantly from more conventional biofuel  
225 feedstocks, exhibiting a comparatively low total sugar content (~45% glucose and 5%

226 xylose) and the presence of contaminants that inhibit enzymatic hydrolysis. These  
227 factors ultimately limit the liquid biofuel yield. Correspondingly, greater quantities of  
228 residual biomass material are available for energy recovery, resulting in a  
229 comparatively high output of co-product electricity. Table S1 in the SI details the  
230 outputs of the process and their respective destinations.

#### 231 **2.4 Co-product allocation**

232 Co-products arising from the conversion of MSW to liquid biofuel can be classified  
233 as energy products (hydrogen; excess electricity); chemicals (acetone); and scrap  
234 materials (metal, plastic and glass) (Figure 1). Allocation methods differ between each  
235 of the LCA methodologies considered.

236 The US EISA and California LCFS employ a system expansion approach, wherein  
237 co-products are assumed to displace production elsewhere, with associated avoided  
238 impacts credited to the primary biofuel product. We assume direct displacement for  
239 co-product electricity (avoiding average UK grid generation), hydrogen (avoiding  
240 production from fossil fuel sources), and acetone (avoiding primary production). Scrap

241 materials require further processing before they displace alternative production in a  
242 market; these downstream processes to convert scrap to saleable materials are  
243 included in the model. Plastic waste, of average composition<sup>31</sup> is input to a mechanical  
244 recycling process to recover, per 1000kg input, 236 kg PET, 63 kg PP, 122 kg PE, and  
245 1 kg PVC.<sup>32</sup> Recovered materials are assumed to displace primary production.  
246 Unrecyclable materials (films, wastes and residues, 580kg) are disposed of by  
247 incineration (71%) and landfill (29%).<sup>27</sup> For metals recycling, we use inventory data  
248 from Gabi and Ecoinvent database.<sup>28, 33</sup> Glass is assumed to be recovered to replace  
249 aggregates and result in negligible net change in GHG emissions and PED.<sup>34</sup>

250 The EU RED methodologies are based on allocating impacts between primary and  
251 co-products on an energy content basis. The original policy, EU RED I, requires  
252 allocation based on the lower heating value of the products, with the exception of  
253 excess electricity which addressed by system expansion. For the EU RED I scenario  
254 we assume co-product electricity displaces average UK grid generation. EU RED II  
255 employs allocation for co-generated heat and electricity based on their respective

256 exergy content, which accounts for the temperature (i.e., quality) of the heat product.

257 All other co-products are considered with energy allocation. Table S4 in the SI

258 presents characteristics and values of exergy allocation. For both EU RED I and II,

259 there is no allocation to non-energy products (recovered metal, plastic). Partitioning

260 ratios are shown in Table 1.

261 Two additional allocation methods are considered that are able to account for non-

262 energy co-products. Mass allocation distributes the GHG emissions associated with

263 main products and co-products based on their respective mass. A two-stage mass

264 allocation is employed: first, upstream processes and waste pre-treatment are

265 allocated between the biofibre and non-biogenic content on a mass basis (see Figure

266 S5 in the SI). Second, we allocate a share of biofuel production impacts to co-product

267 acetone and hydrogen (electricity and heat have no allocation as they have no mass).

268 Finally, economic allocation apportions impacts between co-products on the basis of

269 their financial value. We conduct the allocation considering the overall production

270 outputs, as intermediate product (biofibre) does not have a financial value (see Table  
 271 1).

272 Table 1 Partitioning ratio for mass, energy, and economic allocation.

Allocation	1-Autoclave		2-Biorefinery				
	Biogenic	Non-biogenic	Butanol and ethanol	Acetone	Hydrogen	Electricity and heat	Recovered plastic, metal, glass
Energy value-EU RED I	30.7%	69.3%	61.5%	22.3%	16.1%	-	
Energy value-EU RED II	30.7%	69.3%	8.5%	3.1%	2.2%	86.3%	
Mass value-general	53%	47%	3.2%	1.3%	0.2%	95.3% (as biomass fuel)	(allocated at autoclave)
Economic value	-	-	23.8%	6.1%	2.3%	48%	37.6%

## 273 3 Results and Discussion

### 274 3.1 Greenhouse gas emissions evaluated under current policies

275 Overall, the production of liquid biofuels (butanol, ethanol) from MSW achieves lower  
276 GWP than the reference gasoline product. However, quantified impacts vary  
277 substantially between the LCA methodologies considered.

278 Waste-derived biofuels achieve substantial reductions in GHG emissions and PED  
279 relative to gasoline when employing the system expansion approach, as in US EISA  
280 and CA LCFS policies. Negative GHG emissions (-600% relative to gasoline) are  
281 achieved, due in large part to the significant credit for avoiding landfilling and  
282 incineration in current waste treatment (-576 gCO<sub>2</sub>eq./MJ<sub>biofuel</sub>). Excluding avoided  
283 waste treatment would still result in very low GHG emissions under system expansion  
284 approach (11 gCO<sub>2</sub>eq./MJ<sub>biofuel</sub>) as a result of significant co-product credits for  
285 electricity export and metals recovery (-166 and -202 gCO<sub>2</sub>eq./MJ<sub>biofuel</sub>, respectively).  
286 Recovery of plastics does not provide a significant net reduction in GHG emissions,  
287 as recycling and residual waste disposal incurs similar emissions (418

288  $\text{gCO}_2\text{eq./MJ}_{\text{biofuel}}$ ) as those associated with avoided primary plastic production (-446  
289  $\text{gCO}_2\text{eq./MJ}_{\text{biofuel}}$ ), assuming 100% displacement with recovered plastics. If recycled  
290 plastics are used in other markets, due to their potentially reduced quality relative to  
291 primary plastics, this co-product credit may moderately decrease.<sup>32</sup> Co-products of  
292 acetone and hydrogen only contributes to 4% of the total credits (-30.34  
293  $\text{gCO}_2\text{eq./MJ}_{\text{biofuel}}$ ) (see Figure S7). It is noted in this case study, the relatively low sugar  
294 yield by hydrolysis and correspondingly low biofuel yield results in larger quantities of  
295 residual biomass available for co-product electricity production than with conventional  
296 feedstocks. Major GHG emissions sources arise from the manufacture of enzymes  
297 ( $187 \text{ gCO}_2\text{eq./MJ}_{\text{biofuel}}$ ), included in the total biorefinery emissions indicated in Figure  
298 2a (also see Table S6). Other process inputs (pH control; fermentation nutrients;  
299 microorganism) have smaller impacts, totalling  $20.87 \text{ g CO}_2\text{eq./MJ}_{\text{biofuel}}$ . Treatment of  
300 residual waste from autoclave has a large GHG emission of  $141.01 \text{ g CO}_2\text{eq./MJ}_{\text{biofuel}}$ .  
301 Collection and transport accounts for about 4% while fuel distribution and use  
302 accounts for less than 1% of the total PED and GHG emissions (see Figure S7 in the



303 SI). On balance, with substantially negative GHG emissions, the MSW-derived  
304 biofuels would by far surpass the eligibility requirements for the US EISA policy.

305 GHG emissions are substantially higher when allocation is used to evaluate the  
306 MSW-derived biofuels. The initial RED I policy employs energy allocation between  
307 products, with the exception of co-product electricity: excess electricity is evaluated by  
308 system expansion, and the credit from displacing generation elsewhere is allocated  
309 between the biorefinery products. No impacts are allocated to the recovered metal and  
310 glass co-products, as these material do not have an energy content. RED I results in  
311 GHG emissions of  $86 \text{ gCO}_2\text{eq./MJ}_{\text{biofuel}}$ , achieving only a minor reduction of 9% relative  
312 to gasoline and therefore would not qualify as an eligible biofuel under the policy.  
313 Enzyme production<sup>29</sup> represents approximately 85% of net emissions allocated to  
314 biofuel production. The higher net GHG emissions, relative to the system expansion  
315 approach, result from the exclusion of avoided waste treatment and the apportioning  
316 of the co-product electricity credit between biofuels and other products: of the total 102  
317  $\text{gCO}_2\text{eq./MJ}_{\text{biofuel}}$  credit, only 31  $\text{gCO}_2\text{eq.}$  is credited to the biofuel product. Thus,

318 although the production of biofuels from MSW would achieve significant overall GHG  
319 reductions when all products are considered, this pathway would not be eligible under  
320 the original RED policy.

321 In contrast, under the revised RED II policy, the MSW-derived biofuels would be  
322 eligible, with overall GHG emissions of 23 gCO<sub>2</sub>eq/MJ<sub>biofuel</sub>, a reduction of 75%. With  
323 exergy allocation applied to the co-product electricity and heat, a large share of  
324 biorefinery emissions (86%) are applied to these outputs; correspondingly, fewer  
325 emissions are attributed to the biofuel product. Excess electricity is attributed with  
326 GHG emissions of 86 gCO<sub>2</sub>eq/MJ, which represents a 12% reduction compared to UK  
327 grid electricity mix<sup>35</sup> (see Table S5 in the SI). Enzyme production still contributes the  
328 largest share of GHG emissions attributed to the biofuel outputs (68%).

329 By excluding avoided waste treatment impacts, the RED I and RED II policies ignore  
330 an important service provided by waste valorisation systems of diverting and treating  
331 waste that would otherwise be destined to landfill/incineration. Inclusion of avoided  
332 waste treatment would reduce the GHG emissions assessed under RED I and RED

333 II. Apportioning credits related to avoided landfilling and incineration processes would  
334 result in net GHG emissions of  $-22 \text{ gCO}_2\text{eq./MJ}_{\text{biofuel}}$  and  $8 \text{ gCO}_2\text{eq./MJ}_{\text{biofuel}}$  for RED I  
335 and RED II, respectively. In both cases, biofuel products would achieve eligibility, with  
336 net emissions more completely quantified by including the impact of waste diversion  
337 from conventional routes to input to the production system.

### 338 3.1.1 Greenhouse gas emissions evaluated under alternative allocation methods

339 Mass and economic allocation are considered as alternatives to system expansion  
340 and energy allocation approaches, as these allow allocation to non-energy products  
341 (recovered metal, glass) (see Figure 2a and Table S6). With mass allocation, only a  
342 small fraction of impacts are allocated to the biofuel products, which represent only  
343 3% of product outputs by mass. As a consequence, biofuels are attributed a small net  
344 GHG emission of  $9.2 \text{ gCO}_2\text{eq./MJ}_{\text{biofuel}}$ , or  $-0.4 \text{ gCO}_2\text{eq./MJ}_{\text{biofuel}}$  if avoided waste  
345 treatment is considered. A higher share of emissions are attributed to the biofuel  
346 products under economic allocation (36%) due to the comparatively high value of

347 these outputs relative to other products, resulting in net GHG emissions of 56  
348  $\text{gCO}_2\text{eq.}/\text{MJ}_{\text{biofuel}}$ , or  $-81 \text{ gCO}_2\text{eq.}/\text{MJ}_{\text{biofuel}}$  if avoided waste treatment is considered.

### 349 **3.2 Primary energy demand**

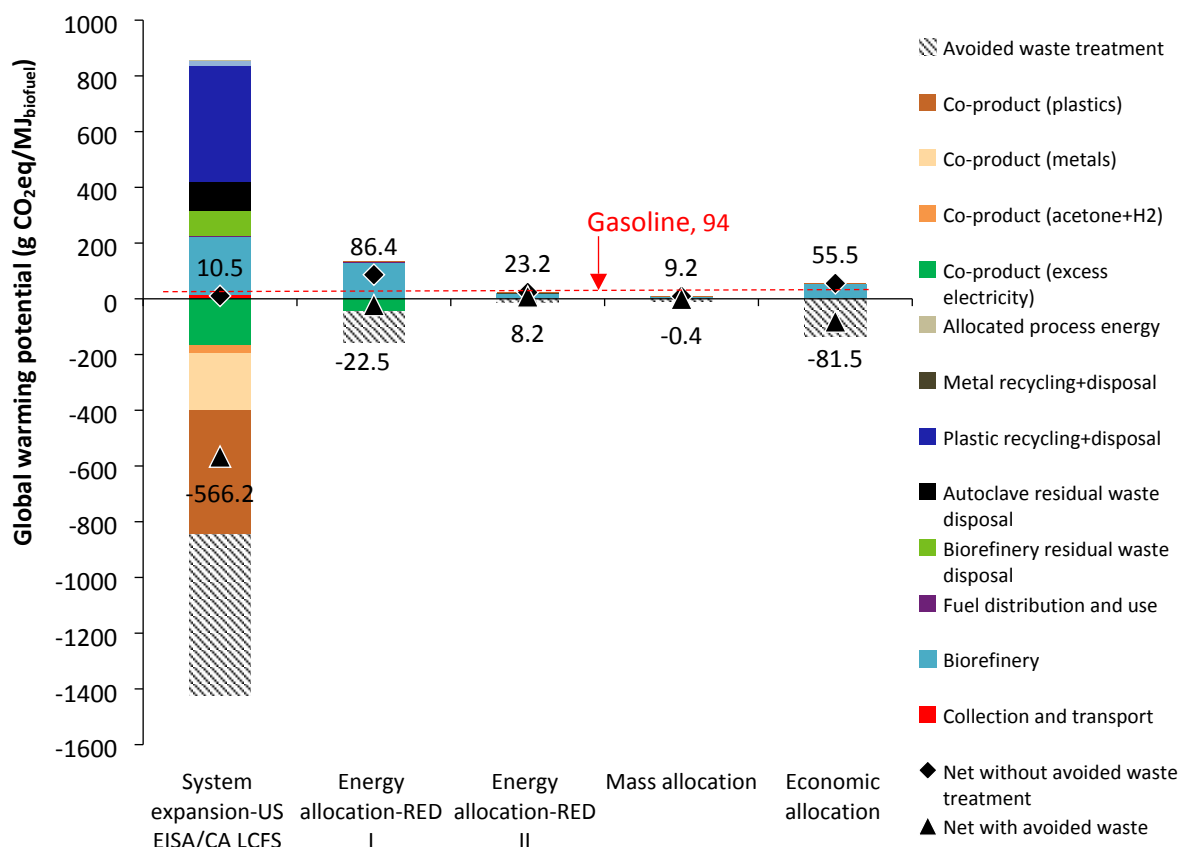
350 MSW-derived biofuels are associated with lower PED than conventional gasoline  
351 fuel. As with GWP, however, the calculated PED varies substantially between LCA  
352 methodologies considered (see Figure 2b and Table S6). Applying system expansion,  
353 as in the US EISA and CA LCFS policies, returns a strongly negative value, with PED  
354 at  $-1,238\%$  relative to gasoline. The large co-product credit associated with recovered  
355 plastics is principally responsible, by avoiding both the consumption of feedstock and  
356 process energy required for plastics manufacture ( $-12.9 \text{ MJ}/\text{MJ}_{\text{biofuel}}$ ). Further, the  
357 disposal of most residual plastic waste by incineration provides useful energy outputs  
358 (heat, electricity) which are credited to the primary biofuel product. Thus plastic  
359 recycling is much more beneficial from a PED perspective than when considering GHG  
360 emissions as in Section 3.1. Electricity co-product also contributes to the strongly  
361 negative PED value ( $-6.85 \text{ MJ}$ ). The largest PED source is the manufacture of

362 enzymes, contributing approximately 2.31 MJ/MJ<sub>biofuel</sub> (total biorefinery demands 3.50  
363 MJ/MJ<sub>biofuel</sub>); Excluding waste treatment results in lower impacts being assessed for  
364 the biofuel products, in contrast with the GWP results. Incineration of residual wastes  
365 provides useful energy outputs, which are forgone when waste is diverted to the  
366 biorefinery process. As such, if avoided waste treatment is excluded from the analysis,  
367 net PED increases to -17.8 MJ/MJ<sub>biofuel</sub>.

368 Results for the allocation approaches (RED I and II, mass, and economic allocation)  
369 follow a similar pattern as those presented in Section 3.1 for GWP. Under RED I, a  
370 reduction in PED of 23% relative to gasoline is achieved, as only the electricity co-  
371 product credit is applied to products. For RED II, a significant share of energy use is  
372 allocated to the heat and electricity co-products, and thus only a small PED  
373 consumption is attributed to liquid biofuels, resulting in a 58% reduction relative to  
374 gasoline. Similarly, mass allocation returns a PED reduction of 75% as only a small  
375 share of production impacts are attributed to the biofuels. From an economic allocation  
376 perspective, however, the biofuel products represent a large share of value of the

377 product outputs (24%) and are correspondingly attributed a large share of life cycle

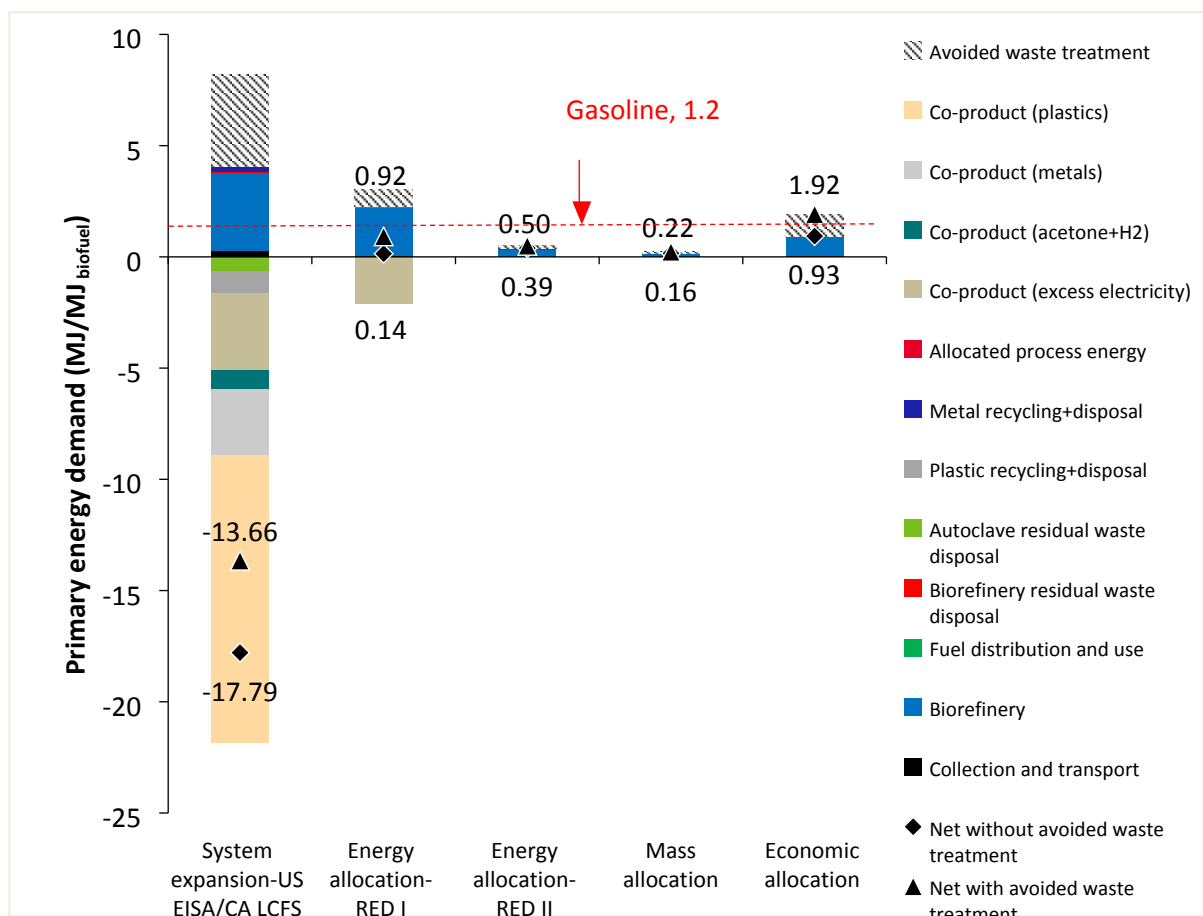
378 PED, resulting in a net increase relative to gasoline of 60%.



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383 **Figure 2** Life cycle global warming potential (a) and primary energy demand (b) of  
 384 MSW-derived liquid biofuel relative to reference fossil fuel based on different allocation  
 385 methods.

386 **3.3 Comparison with other waste treatment routes**

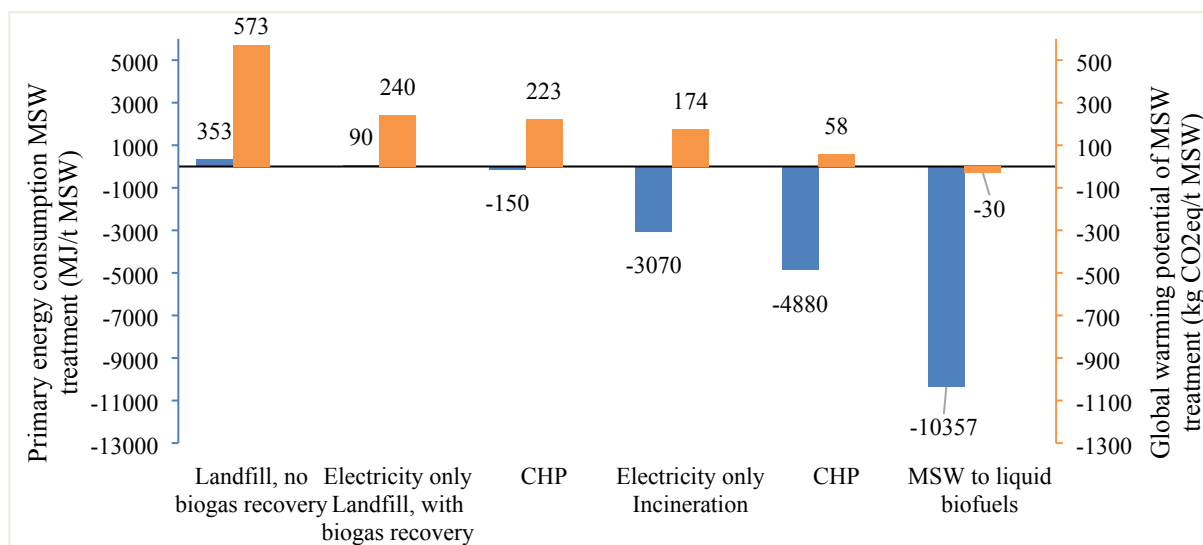
387 Presenting study results on the basis of 1 tonne MSW treated enables comparison  
 388 between waste management options. For this analysis, system expansion is employed

389 for all waste treatment processes to understand the total impacts of the treatment  
390 process and product outputs (including liquid biofuel use in place of gasoline). We  
391 compare current case study results with conventional treatment processes: landfill  
392 without biogas recovery, landfill with biogas recovery and incineration for energy  
393 recovery (electricity only or CHP generation) (Figure 3). MSW conversion to liquid  
394 biofuels is the superior option for both categories, achieving significantly greater  
395 reductions in GHG emissions and PED than conventional waste treatment routes.  
396 Without landfill gas capture, sanitary landfill operation emits the highest GHG  
397 emissions of 573 kg CO<sub>2</sub>eq/t MSW; with landfill gas capture, the GWP of landfilling for  
398 the electricity only and CHP options are 240 and 223 kg CO<sub>2</sub>eq/t MSW, respectively.  
399 Increasing capture rate of biogas has been reported to be key in reducing the GWP of  
400 the landfill option<sup>20</sup>. In comparison, incineration is a net source of GHG emissions, as  
401 fossil CO<sub>2</sub> emissions, largely from plastics combustion, exceed avoided emissions  
402 associated with displacing heat and electricity production elsewhere. This results in  
403 emissions of 174 and 58 kg CO<sub>2</sub>eq/t MSW for the electricity-only and CHP incinerators,



404 respectively. Incineration is able to recover useful energy from waste, indicated with  
405 negative PED for both electricity and CHP scenarios (-3070 and -4880 MJ/t MSW,  
406 respectively. MSW conversion to liquid biofuels, alongside electricity, acetone,  
407 hydrogen, and recyclates, delivers a far greater reduction in GWP (-30 kg CO<sub>2</sub>eq/t  
408 MSW) and PED (-10357 MJ/t MSW) than conventional waste treatment options  
409 (disaggregated inputs can be found in Figure S8 in the SI). Further improvements  
410 could be realised by finding markets for excess heat. In the current study, we assume  
411 excess heat has no use. However, if the autoclave/biorefinery is integrated with other  
412 industrial processes, district heating, or finds other uses (sterilization; cooling  
413 generation), this would result in further reductions in GWP (110 kgCO<sub>2</sub>eq./t MSW) and  
414 PED (1,700 MJ/t MSW).

415



416

417 **Figure 3** Life cycle primary energy demand (left axis) and global warming potential

418 (right axis) comparing MSW-derived liquid biofuels with landfill and incineration

419 options.

420 **3.4 Discussion**

421 The study evaluates alternative allocation methodologies for the life cycle evaluation

422 of waste-derived biofuels, considering a case study of butanol and ethanol production

423 from MSW. While biofuel production from MSW is demonstrated to reduce GHG

424 emissions and PED relative to gasoline, the magnitude of these reductions are

425 dependent on the allocation method employed. In practice, LCA researchers and

426 policy makers have to select one allocation method that is most appropriate for the  
427 analysis of biofuel systems. To do so requires careful consideration, as alternative  
428 allocation methods are ultimately answering very different questions.

429 System expansion aims to understand the overall impact of introducing a new  
430 product system. This approach benefits from its comprehensiveness in evaluating the  
431 overall impact of the product system, but is based on a clear identification of biofuels  
432 as the primary product and all other outputs as secondary. Where there are large co-  
433 product outputs, associated credits can distort the results and risk not reflecting  
434 stakeholder values or decision criteria. In the current study, significant electricity and  
435 recovered metal co-products contribute to very negative emissions; avoided waste  
436 treatment benefits are also solely attributed to the primary product. Whether it is  
437 appropriate to consider liquid biofuels as a primary product is questionable, given that  
438 this output represents only 24% of the financial value of system outputs, and  
439 substantially less on energy (2.6%) and mass (1.7%) bases.

440 An alternative approach to evaluate the overall impacts of waste conversion to  
441 biofuels may be from the perspective of a waste treatment system – using a functional  
442 unit of one tonne MSW, or equivalent – and thus taking into account all of the diverse  
443 outputs of the system without having to artificially identify a single primary product.  
444 Such results are not useful in biofuels policies that require a specific impact be  
445 attributed to the biofuel product. However, such a framework could be appropriate for  
446 a waste treatment sector-focused approach to evaluating and supporting higher value  
447 products from waste (biofuels, bulk and high value chemicals, others), while  
448 concurrently supporting diversion from conventional treatment routes.

449 In contrast, allocation approaches aim to attribute impacts to a specific, single  
450 product. Allocation is, in theory, effective at isolating the impact of biofuel products  
451 from the other outputs of the waste biorefinery system. However, the diversity of  
452 products poses a challenge, as some cannot be addressed with energy allocation  
453 (e.g., recovered metal, glass), and others cannot be addressed by mass allocation  
454 (e.g., electricity, heat). Economic allocation may be more appropriate considering

455 these issues, with further benefit of being able to better consider the motivations of  
456 producers. However, this approach faces challenges including fluctuation of results  
457 with market prices, and challenges of including non-monetisable goods within the  
458 analysis.

459 A key question facing the analysis of waste-derived fuels is how avoided waste  
460 treatment should be included within LCA calculations. Avoided waste treatment is  
461 excluded in EU policy, but this approach ignores the “co-service” of waste treatment  
462 provided by biofuel production and thus overestimates the impacts of waste-based  
463 fuels. In contrast, system expansion gives full credit to biofuels for waste diversion,  
464 despite this being but one product of the biorefinery system, and ignoring any other  
465 changes occurring in the waste treatment sector, including those in response to policy  
466 drivers to limit or reduce waste to landfill (and increasingly, to incineration). In future,  
467 multiple viable opportunities may exist to utilise MSW, and therefore the role of a single  
468 use in avoiding conventional waste treatment would be questionable. Sector  
469 interactions are notoriously challenging for LCA to address (for example, induced land

470 use change arising from crop-based biofuels), but should be pursued in future work to  
471 ensure that the contexts of the energy and waste sectors are properly considered. At  
472 present, by excluding the benefits of diverting wastes from landfill and incineration, EU  
473 policy disadvantages biofuel production relative to other, lower-value uses of waste  
474 streams.

475 Biofuel production from mixed wastes poses specific challenges to LCA practitioners  
476 and policymakers. As illustrated in the current study, methodology decisions  
477 dramatically influence results, with waste-derived biofuels either reducing GHG  
478 emissions by 9% relative to gasoline under the EU's RED I policy, or by 700% using  
479 system expansion as in US EISA and CA LCFS policies. Development of a relevant  
480 LCA framework that can account for the complexities of waste biorefining is essential  
481 to provide appropriate policy support for waste-derived fuels.

## 482 **Associated Content**

483 The Supporting Information is available free of charge on the ACS Publications  
484 website at DOI: XXX.

485 Supporting Information includes additional details on the allocation method, figures  
486 and tables that support the modelling and the results interpretation. Figures S1–S6  
487 show the boundaries, flows and processes considered in the allocation methods.  
488 Figures S7-9 shows the environmental efficiency of waste to biofuel, comparison with  
489 other waste treatment routes and sensitivity analysis results. Table S1 summarises  
490 the outputs of the autoclave and biorefinery process. Table S2 is an overview of  
491 current biofuel regulations in the EU and US. Table S3 characterises the system  
492 expansion method for MSW to ABE pathway. Table S4 presents characteristics and  
493 values of exergy allocation for RED II methodology. Table S5 displays GHG emissions  
494 of co-products under different allocation methods compared to Ecoinvent 3.3 values.  
495 Table S6 presents life cycle GWP and PED of MSW-derived liquid biofuel relative to  
496 reference fossil fuel based on different allocation methods corresponding to Figure 2.

497

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504 **Notes**

505 The authors declare no competing financial interest.

506



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