Advanced Biofuels Canada
Biocarburants avancés Canada

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Email: michael.bishop@ontario.ca

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Re: Ministry of the Environment, Conservation and Parks (MECP) policy proposal 'Proposed Lifecycle Analysis Models and Technical Guideline Updates for the Cleaner Transportation Fuels Regulation' (019-5144)

Advanced Biofuels Canada (ABFC) appreciates the opportunity to provide comments on the subject policy proposal.

Advanced Biofuels Canada is the industry voice for producers, distributors, and technology providers for advanced biofuels and renewable synthetic fuels. ABFC members produce a portfolio of liquid low-carbon fuels, sustainable feedstocks, intermediary products, and produce/consume low carbon gaseous products, such as renewable natural gas ('RNG') and low carbon hydrogen. Members are also engaged with carbon capture utilization and storage technologies. Our members operate over 23 billion litres of low carbon fuel production capacity globally and are significant suppliers to renewable and low carbon fuel regulations in Canada and worldwide.

ABFC supports the proposal to approve versions 4.03 of GHGenius, recommends v. 5.02. ABFC supports the continued use of the GHGenius model. GHGenius is the most transparent LCA model available in Canada, it uses the most accurate data for Canadian feedstocks, it is updated regularly, and it includes land use change impacts that are associated with fuels being analyzed. Following the approval of the updated versions, ABFC suggests that MECP moves to adopt the 5.02 version of GHGenius. British Columbia's LCFS will use this updated version. We note that the updated version has improved functionality and the ability to specify regulation-specific dashboard output. ABFC suggests that updates made for specific pathways within GHGenius 4.03, as decided on via in this consultation, carry through to subsequent model versions approved by Ontario MECP. This helps ensure that future GHGenius versions incorporate the added flexibility considered in this consultation.

ABFC supports updating the model to incorporate biodiesel from brown grease. Incorporating this pathway will help reduce emissions from Ontario's transportation sector, address waste disposal impacts, and derive value from underutilized by-products.

ABFC supports the eligibility of renewable fuels produced from wastes and residues; however, biodiesel from fatty acid distillates – when sourced from the palm supply chain – may carry negative environmental impacts. We note that palm is deemed a High ILUC-risk feedstock under the federal

Clean Fuel Regulations (s.50(1)) and its use is not eligible for CFR credit creation. This includes its derived co-products, such as Palm Fatty Acid Distillate, and Used Cooking Oil (UCO), but is not understood to include industrial effluents such as Palm Sludge Oil (PSO), which is a CFR-eligible pathway. We suggest that Ontario approve the model update to enable this pathway; however, information on feedstock source of the fatty acid distillates should be required via compliance reports specified in 10 (1)(7) of the regulation:

> *The volume and greenhouse gas intensity, calculated on a weighted average basis by volume, of the bio-based content of the blended gasoline and blended diesel that the fuel supplier placed in the Ontario market during each quarter of the compliance period.*

ABFC supports updates to the model to enable renewable diesel from non-rendered cooking oil and from biodiesel distillation bottoms. These updates will permit fuel supplier flexibility and allow the LCA model to more accurately reflect the fuel production process being used.

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Please let us know if we may elaborate on our comments provided above.

Yours truly,

ADVANCED BIOFUELS CANADA

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