



February 6, 2023

Via E-mail/Facsimile

Ministry of Environment, Conservation and Parks
College Park 5th Flr, 777 Bay St,
Toronto, ON M7A 2J3

To Whom it may concern:

Chevron Renewable Energy Group (REG) appreciates the opportunity to comment. On December 8th, 2022, four lifecycle analysis models (fuel pathways) for biodiesel and renewable diesel were posted on the Cleaner Transportation Fuels Regulation website for public comment under ERO number 019-5144.

Chevron is a major refiner and marketer of petroleum products and renewable fuels. With the recent acquisition of Renewable Energy Group, Inc., which was completed in June 2022, Chevron is also an international producer of lower carbon intensity fuels with a global integrated procurement, distribution, and logistics network and 11 biorefineries in the U.S. and Europe. In 2021, Chevron Renewable Energy Group produced 480 million gallons of renewable liquid fuels, resulting in 4.1 million metric tons of CO₂ reduction, and is helping lead the energy transition to a lower carbon future.

Following review of these fuel pathways, Chevron Renewable Energy Group supports their approval on their technical merits. In addition, we believe that the feedstock types shown (brown grease, non-rendered used cooking oil, biodiesel distillation bottoms, and fatty acid distillates) should also be made eligible for both biodiesel and renewable diesel fuel production. These feedstocks can be used to produce both fuels and as such, allowing each of them to qualify would benefit renewable fuel producers, increase feedstock flexibility, give regulated parties more optionality, and ultimately broaden the access to lower carbon fuels across Ontario.