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## Support for increasing accuracy of GHG intensity determination

Advanced Biofuels Canada supports Ontario's decision to update the *Technical Guideline: Cleaner Transportation Fuels 2023* (the Guideline) with the addition of section 3.6 Treatment of Non-Fuel Products. The addition of this section specifically addresses the case where a bio-based fuel producer also produces non-fuel products with different emission intensities; this will allow these producers to calculate GHG intensities more accurately when they are able to provide sufficient supporting data. The three proposed determination methodologies: direct measurement, output-based allocation, and facility average, are appropriate as are their hierarchical rules of use.

## Clarity and caution required with respect to application of section 3.6

We note that the updated Guideline does not include a definition of 'non-fuel products' and as a result some ambiguity persists with how and when the methodologies of section 3.6 are to be employed. Providing clear boundaries on when section 3.6 applies will help mitigate the unintentional or intentional misuse of this methodology in situations where it was not intended to be applied. For example, a fuel producing facility that is co-processing bio-based content can have non-fuel products in their refining stack of outputs and, given that bio-based inputs are not evenly distributed across the refined outputs<sup>1</sup>, accurate determination of the bio-based content and attendant GHG intensity is not possible using the proposed methodologies presented in section 3.6. For this example, we support the use of a methodology that adheres to best practices as found in fuel regulations such as: California LCFS, Canada CFR, BC LCFS. These locales have identified Carbon 14 (C14) testing (per ASTM D6866 Method B) as an appropriate method to quantify the amount of renewable carbon present in finished co-processed products which in turn supports the allocation of emissions across these products.

We appreciate the opportunity to contribute to the development of this Guideline and welcome your comments or questions.

Best regards,

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<sup>1</sup> Lee, Argonne National Laboratory: *Carbon Intensities of Refining Products in Petroleum Refineries with Co-processed Biofeedstocks, 2022*