

December 19, 2023

Surbhi Jain
Climate Change Programs and Partnerships Branch
40 St Clair Ave West
14th Floor
Toronto, ON
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Canada

RE: ERO# 019-7732 Cleaner Transportation Fuels Regulation - Technical Guideline updates for facilities with non-fuel products

Dear Public Input Coordinator;

On behalf of the Canadian Fuels Association (CFA), we thank you for the opportunity to provide feedback on this important issue. CFA members¹ are committed to a future where Canadians achieve significant transportation greenhouse gas (GHG) emissions reductions without compromising the ability to move people and goods. Our [Driving to 2050 Vision](#) highlights how Canada's transportation fuel sector is innovating and investing in the development of clean transportation-energy choices which include reliable, affordable low-carbon liquid fuels.

CFA and our members have reviewed and are supportive of the proposed changes to Technical Guideline for facilities with non-fuel products for the Cleaner Transportation Fuels Regulation (CTFR). The changes are consistent with the continued evolution of the industry. We take this opportunity to offer suggestions on further changes that would align with emerging low carbon fuel technologies.

CFA would encourage the government to consider steps to expand eligible fuel options to the CTFR. Amendments should include the addition of Sustainable Aviation Fuel (SAF) as an opt-in to the diesel pool. This would help to facilitate the deployment of SAF in Ontario as we are seeing the emergence of SAF across global economies given the limited options available to decarbonize the aviation sector. Similarly, the addition of language to confirm the recognition of co-processing would be a positive step. To support this, CFA members would benefit from the addition of an accounting protocol for co-processing to the technical guidance (similar to British Columbia's Low Carbon Fuel Regulation or the

¹ Canadian Fuels members: : Braya Renewable Fuels, Federated Co-operatives Limited, Greenenergy, Greenfield Global, Imperial Oil Limited, Irving Oil, North Atlantic, North West Redwater Partnership, Parkland Corporation, Petro-Canada Lubricants Inc., Shell Canada Limited, Suncor Energy Products Partnership, Tidewater Midstream and Infrastructure Ltd. and Valero Energy Inc.

federal Clean Fuel Regulations). The protocol would help proponents properly demonstrate Carbon Intensity values of co-processed fuels. Co-processing is an appealing option for fuel providers as it enables them to utilize their existing infrastructure to produce lower carbon fuels.

In looking to the future, we also encourage the government to consider using the federal Fuel LCA model to both avoid the use of an outdated version of GHGenius and the current patchwork of LCA models used for compliance across Canada. This will reduce burden on all stakeholders, while creating new opportunities for the production and deployment of low-carbon fuels in Ontario.

CFA thanks you again for this opportunity to participate in this important work. We are committed to working with the Ontario government to help reduce greenhouse gas emissions from the transportation sector. Should you have any questions about these, or any other issues related to fuels and their place in Ontario's energy supply mix, please do not hesitate to reach out. We look forward to hearing from you.

Sincerely,



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About CFA

CFA represents the producers, distributors and marketers of transportation energy, including gasoline, ethanol, bio-based diesel, jet fuel, as well as, specialty fuels and lubricants. Our sector represents 111,000 workers, 15 refineries, 8 Clean Fuels production facilities, 75 distribution terminals, and 12,000 retail and commercial sites. Five refineries and five clean fuels facilities are located here in Ontario. Our members supply 95% of the transportation fuel Canadians use every day.

We have a long history of working collaboratively with governments to strengthen environment, health and safety policies while ensuring an uninterrupted supply of fit-for purpose transportation fuels to meet the needs of Canadian consumers and businesses.