

January 15, 2024

Melissa Ollevier
Financial Instruments Branch
40 St. Clair Avenue West
Floor 8
Toronto, ON
M4V 1M2
Canada

RE: ERO# 019-7649 Regulatory amendments to clarify program requirements and improve program efficiency for Emissions Performance Standards (EPS) and GHG Reporting programs

Dear Ms. Ollevier;

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 the proposed amendments to the Emissions Performance Standards (EPS) and GHG Reporting programs and are supportive. We believe this effort supports MECP's stated objective to achieve emission reductions from big polluters and achieve Ontario's share of Canada's 2030 emissions reduction target without driving away business and job creators.

We are supportive of the proposal to adjust the electricity and cogeneration thermal energy methods for calculating a facility's annual emissions limit such that additional facilities will be permitted to use these methods. This allows the methodology to be applied consistently across all sectors.

CFA was pleased to see amendments regarding Renewable Natural Gas (RNG). This provides a signal for low carbon intensity gaseous fuel/feedstock investment that is currently not available in the province. MECP needs to design a process that is administratively simple and provides a clear and detailed outline of the information required by a facility to demonstrate eligibility. Further, members will require clarity

¹ Canadian Fuels members: Braya Renewable Fuels, Federated Co-operatives Limited, Greenergy, 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.

between overlapping regulations at the federal and provincial level, specifically EPS RNG policy and the federal Clean Fuel Standard regulation.

CFA is concerned with implementation timelines for 2023 compliance reporting. Third-party verified compliance reporting takes a significant amount of work, resources, and planning for regulated facilities. Data and calculations for compliance year reporting are finalized early in the first quarter, followed closely by the start of third-party verifications. This would increase reporting burden and add work to amend calculations. It is imperative that the amended changes be finalized and communicated promptly to avoid administrative burden and reporting delays.

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 while meeting the province's growing energy needs. 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,



Landon Tresise
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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.