

# Advanced Biofuels Canada

Dear Rachel Assink,

Thank you for the opportunity to submit joint comments on rules pertaining to the Clean Fuel Standard. Our organization is the primary advocate of the BC LCFS; we have worked for over a decade to support the success of the standard, and also the OR CFP.

We believe that WA very plausibly set a target of 20% CU reduction by 2034. When the BC and California LCFS were established, the compliance options were limited. Notwithstanding this, obligated parties have adapted to stringent requirements. A WA CFS will have a plethora of compliance choices, a number of which were in their infancy a decade ago.

We believe that a 20% reduction by 2034 can be reached through electric mobility, advanced biofuels, renewable natural gas, and hydrogen. To reach a 20% target, WA does not need credit generation to come from CI improvements in fossil fuels. Given that the largest portion of tailpipe GHG comes from the crude in gasoline and diesel, it is important to ensure that the majority of crediting comes from actions that displace crude oil.

We would be pleased to offer additional information relative to the BC LCFS.

Sincerely,

Ian Thomson  
President  
Advanced Biofuels Canada