

March 2, 2026

Washington State Department of Ecology
15700 Dayton Ave N,
Shoreline, WA 98133
(Submitted via Public Comment Form)

Re: Chapter 173-424 WAC and WAC 173-455-150, Clean Fuels Standard Rulemaking

Dear Washington State Department of Ecology (Ecology),

Advanced Biofuels Canada Association (ABFC) is Canada's national trade association for advanced biofuels and renewable synthetic fuels. ABFC members produce a portfolio of liquid low-carbon fuels, sustainable feedstocks, and intermediary products. Our members operate over 11 billion gallons of low carbon fuel production capacity globally and are significant suppliers to renewable and low carbon fuels in Canada, the U.S., and worldwide. Many of our members have operations in both the United States and Canada.

Thank you for the opportunity to provide feedback on the Department of Ecology's (Ecology) January 2026 notice implementing SSHB 1409, Clean Fuels Standard Rulemaking.

- **ABFC supports Washington's Clean Fuel Standard (CFS) target increase from 20% to 45% below 2017 levels by 2038.** The increase provides important long-term policy certainty for low-CI fuels which supports continued investment and operation of facilities. ABFC encourages Ecology to ensure annual carbon intensity reductions remain aligned and achievable by the demonstrated low-carbon fuel supply sector in North America. Strong participation of clean liquid fuels produced from North American agriculture supports policy durability, predictable compliance costs and minimizes consumer price impacts.
- **Effective and durable fuel policies are a useful area of inter-jurisdictional policy collaboration.** Washington's Clean Fuel Standard (CFS) is an essential part of the growing list of U.S. and

Canadian jurisdictions which have implemented effective clean fuel policies. Canadian biofuels producers are positioned to deliver under WA's accelerated curve. The stronger trajectory supports North American emission reduction ambitions, with suppliers operating across the low-CI corridor (BC, WA, OR, CA, and Canada).

- **Science-based lifecycle analysis (LCA) is a fundamental part of clean fuel regulations.** ABFC acknowledges the value of inter-jurisdictional alignment on model versions; therefore we support Washington's transition to WA-GREET 4.0. We encourage Ecology to consider emerging research on the appropriateness of including quantitative Indirect Land Use Change (ILUC) values. We note that Canadian jurisdictions utilize a risk-based approach to ILUC. Canada's LCA approach for fuel pathways under the Clean Fuel Regulations includes conservative direct land-use change emissions.
- **Liquid low carbon fuels are a fundamental component of clean fuel policies.** ABFC encourages continued technology-neutral implementation recognizing the complementary role of liquid low-carbon fuels alongside electrification pathways, particularly for aviation, marine, and heavy-duty applications where near-term electrification remains limited.
- **Streamlined LCA approvals will create competitive fuel markets and encourages fuel price stability.** ABFC supports streamlined recognition of approved pathways across West Coast programs to reduce administrative processes and accelerate deployment of low-CI fuels.
- **ABFC highlights the importance of effective compliance markets.** Stable credit markets are essential to sustaining investment decisions across integrated North American fuel markets. Integrated Canada–U.S. supply chains already support Washington compliance markets, and regulatory alignment helps ensure reliable fuel availability while supporting regional energy security. [The US-Canada Energy Annex](#) commits to regulatory transparency, which along with the [Pacific Coast Collaborative](#) create a framework for ongoing interaction between aligned jurisdictions.

The Pacific Coast Collaboration includes the following statements:

Transforming Transportation: Our shared low carbon fuels policies have replaced over 20 billion gallons of petroleum fuels with clean, low-carbon alternatives, eliminating 150

million metric tons of carbon dioxide emissions and generating new clean energy jobs and businesses.

Thank you for this opportunity to provide comments, we welcome the opportunity to meet with you to discuss these recommendations further.

Yours truly,



Fred Ghatala,

President, Advanced Biofuels Canada

CC: The Honourable Tim Hodgson, P.C., M.P., Minister of Energy and Natural Resources
Minister.Ministre@NRCan-RNCan.gc.ca

About Advanced Biofuels Canada Association:

Advanced Biofuels Canada Association (ABFC) is the national industry voice for producers, distributors, and technology providers for non-fossil, low carbon, and sustainable fuel replacements to gasoline, diesel and jet fuels. ABFC members produce a portfolio of liquid clean fuels (including ethanol, biodiesel, renewable diesel and low carbon jet fuel, or LCJF), sustainable feedstocks, intermediary products, and produce/consume low carbon gaseous products, such as renewable natural gas (RNG) and low carbon hydrogen. Members are also engaged with carbon capture, utilization, and storage technologies. Our members operate over 45 billion litres of low carbon fuel production capacity globally and are significant suppliers to renewable and low carbon fuel regulations in British Columbia, Canada, and worldwide.