

Honourable Bill Bennett  
Minister of Energy and Mines  
Government of British Columbia  
Parliament Buildings  
PO BOX 9069 STN PROV GOVT  
Victoria, British Columbia, V8W 9E2  
Via email: MEM.Minister@gov.bc.ca

February 24<sup>th</sup>, 2015

**Re:** Support for the Renewable and Low Carbon Fuel Requirement Regulation

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Dear Minister Bennett,

We understand that you'll be making a decision soon about the Renewable and Low Carbon Fuel Requirement Regulation (RLCFRR) that went through a stakeholder review last year. We support this policy because it is successful, has future potential, is achievable, is demonstrated in other jurisdictions and is part of the Pacific Coast Collaborative on Climate and Energy. We encourage you to maintain the RLCFRR's integrity by keeping the rule as is and strengthening it over time.

**Success to date:** The RLCFRR has already reduced emissions by 900 kt CO<sub>2</sub>eq per year - a full quarter of emission reductions to date in British Columbia<sup>1</sup>. Achieving these reductions has spurred the creation of 25 additional businesses in British Columbia and 58 different processes for creating low-carbon fuels<sup>2</sup>. These businesses bolster British Columbia's clean transportation sector which employed 23,000 people in the province in 2011<sup>3</sup>. The public as well remains supportive of the policy – although few are aware of it<sup>4</sup>.

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<sup>1</sup> Navius Research (2014) The Renewable and Low Carbon Fuel Requirement Regulation. [http://www.naviusresearch.com/data/resources/BC\\_RLCFRR\\_Communication\\_Brief.pdf](http://www.naviusresearch.com/data/resources/BC_RLCFRR_Communication_Brief.pdf)

<sup>2</sup> IBID

<sup>3</sup> Globe Advisors (2012) British Columbia's Clean Transportation Sector. [http://globe.ca/wp-content/uploads/2012/10/GLOBE\\_BCCleanTransportationReport\\_FINAL.pdf](http://globe.ca/wp-content/uploads/2012/10/GLOBE_BCCleanTransportationReport_FINAL.pdf)

<sup>4</sup> Navius (2014)

**Future Potential:** The RLCFRR is expected to reduce emissions by up to 3.5 MT CO<sub>2</sub>eq by 2020<sup>5</sup>. These reductions will be in part achieved by local B.C. businesses like the clean energy sector, keeping jobs and spending in British Columbia.

**It's achievable:** Available fuel supplies can grow to replace 400,000 barrels per day of oil use along the pacific coast - more than enough fuel to meet current and future low-carbon fuel standards along the coast. These fuels include a mix of biofuels, electricity and natural gas<sup>6</sup>.

**Other jurisdictions are doing it:** California has seen a steady decline in the carbon content of its fuels over the past 4 years. The market there has responded to the policy with companies steadily lowering the carbon-intensity of fuels through shifts to lower carbon feedstocks, efficiency improvements, and a switch from petroleum-based fuels to alternatives such as biodiesel, biomethane, and electricity. As of September 2014 the policy had achieved nearly ten million tons of CO<sub>2</sub>eq reductions<sup>7</sup> and is contributing to the state's clean energy goals. Collectively, the standard and other clean transportation policies are projected to save over \$21 billion by 2025 through reduced public health burdens, increased energy security and decreased carbon pollution, while also avoiding thousands of asthma attacks and work days lost<sup>8</sup>. Other jurisdictions are poised to move forward as well. Oregon is nearing implementation and Washington State has drafted rules.

**We're committed to it:** Premier Clark signed the Pacific Coast Climate Action Plan on Climate and Energy that committed British Columbia "to maintain [its] existing standard"<sup>9</sup> and in the recent speech from the throne that "[British Columbia] will continue to provide a positive example to the world that there is no need to choose between economic growth and fighting climate change."

We believe that a growing economy and leadership on climate change are compatible and the RLCFRR helps make that possible. Thank you for your leadership to date and we look forward to the continuation of a strong and strengthened RLCFRR.

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<sup>5</sup> Navius (2014)

<sup>6</sup> ICCT & E4tech (2015) Potential Low-Carbon Fuel Supply to the Pacific Coast Region of North America

<sup>7</sup> California Air Resources Board (2014) 2014 LCFS Reporting Tool Quarterly Report  
[http://www.arb.ca.gov/fuels/lcfs/20150107\\_q3datasummary.pdf](http://www.arb.ca.gov/fuels/lcfs/20150107_q3datasummary.pdf)

<sup>8</sup> EDF (2014) Driving California Forward <http://www.edf.org/climate/drivingcaliforniaforward>

<sup>9</sup> Pacific Coast Action Plan on Climate and Energy (2013)  
<http://www.pacificcoastcollaborative.org/Documents/Pacific%20Coast%20Climate%20Action%20Plan.pdf>

Sincerely,

**Merran Smith - Director**

Clean Energy Canada

**Paul Kariya - Director**

Clean Energy BC

**Matt Horne - Associate Director, BC**

Pembina Institute

**Paul Manson - Director, President and CEO**

Sea Breeze Power Corp

**Ian Bruce - Manager, Science and Policy**

David Suzuki Foundation

**Stephen Cheeseman - Chairman and CEO**

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