



February 15, 2008

Mr. Paul Wieringa
Executive Director, Major Initiatives Branch
Ministry of Energy, Mines and Petroleum Resources
Victoria, BC
(by email: paul.wieringa@gov.bc.ca)

Dear Mr. Wieringa,

Re: Renewable Fuel Standard and Low Carbon Fuel Standard

Thank you for the invitation to comment on the development of renewable and low-carbon fuel standards in BC. BC Sustainable Energy Association is pleased to make the following submissions, based on the information you presented at the MEMPR NGO Forum on 17 January, and relevant policies in the government's 2007 Energy Plan.

The BCSEA is a non-profit society dedicated to promoting sustainable energy in British Columbia and in fostering a fundamental shift in energy use toward generally sustainable practices. We are especially concerned with greenhouse gas emissions and the need to move away from the widespread use of fossil fuels. Formed in 2004, the BCSEA has some 700 members and eight chapters around the province.

Policy framework

The BCSEA understands that the policy parameters for the current initiative are Policy Actions 32 & 33 in the 2007 Energy Plan. We further understand: (i) that the designation "low carbon" is to be considered as *net* carbon dioxide emissions, (ii) that this should be read as including any other greenhouse gases that may be relevant, and (iii) that the assessment is to be on a life cycle basis.

Life-cycle assessment and finding suitable fuels

The BCSEA commends the government for adopting a life cycle standard for the assessment of fuels. The BCSEA considers this to be an absolutely essential standard, if the intended purpose, "to help reduce emissions" (vis Policy Action 32), is to be achieved. We are deeply concerned that, globally, many initiatives to produce fuels renewably through growing plants appear to increase, rather than decrease, carbon dioxide and other greenhouse gas emissions.

We outlined our concerns about "dedicated energy crops," with reference to the government's draft revisions to the BC Clean or Renewable Energy Guidelines (see our letter of 12 February, attached). Assuming that the BC Clean or Renewable Energy standard would not be based on life cycle evaluations and would not include monitoring and verification, we took the position that "dedicated energy crops" should not be accepted as "clean or renewable."

The BCSEA doubts the ability of the bio-fuel industry to produce fuels that would genuinely contribute to a reduction in greenhouse gas emissions, that would not unduly harm people by competing with food crops, and that would be genuinely renewable over the long term, i.e. without significant harm to soils and ecosystems. We have seen alarming reports on bio-fuels which seem not only to disprove the putative reductions in greenhouse gas reductions, but also, more broadly, seem to call into question the basic validity of the bio-fuel concept, as applied to purpose-grown plants ((e.g. the Los Angeles Times report on studies in Science by Joe Fargione, University of Minnesota and Timothy Searchinger, Princeton University (<http://www.latimes.com/news/science/la-sci-biofuel8feb08,0,4389870.story>)).

Such fuel sources would – properly, in our view – be excluded from any renewable, low-carbon fuel standard that was based on a life cycle assessment. This argument would cover trees (purpose-grown or not) as well as crops. Agricultural waste has been cited as a possible source for fuel energy; however, there is evidence that such “waste” is in fact essential for the maintenance of healthy soil (e.g., see the article by George Monbiot for the Guardian, 12 February 2008: <http://www.monbiot.com:80/archives/2008/02/12/the-last-straw/>).

It is not clear to the BCSEA that there are abundant, environmentally and socially benign energy sources that could yield fuels to mix with gasoline and diesel. We are aware of on-going research into liquid fuels from the food industry’s animal wastes and from algae; however, these initiatives do not yet seem to be commercially viable.

The BCSEA feels that, to ensure the government’s commitment to a life cycle standard, it would be necessary to implement a substantial structure to assess and verify any candidate “renewable and low carbon” fuel. There would need to be the capacity to research beyond the manufacturer’s statements, and there would need to be a reliable monitoring and inspection program. There would need to be transparency and accountability, so that parties with a general public interest would be able to review, verify and if necessary, challenge the assessment of a fuel.

There is, at present, no such program of assessment and verification, and in our view, it would not be practical for MEMPR to implement such a program for fuels produced outside of BC. Conceivably, an effective program might be implemented within Canada, but for present purposes, BCSEA recommends that the “renewable and low carbon” standard be defined in such a way that it could only be met with BC-produced fuel. Further, we recommend that the assessment and verification process be defined in such a way as to ensure that parties with a general public interest would have effective access to information to review any fuel that was accepted. Since this is a pilot initiative, it would be appropriate to have a standing oversight committee or working group of stakeholders. The BCSEA would be glad to participate in such a group.

Ethanol content

Policy Action 33 specifies ethanol as the fuel to be promoted to mix with gasoline. At present, ethanol that might be considered “renewable and low carbon” is created from purpose-grown crops or from agricultural or forestry wastes. Based on the arguments above, the BCSEA believes ethanol would not pass a life cycle test for reducing carbon dioxide or other greenhouse gas emissions.

We suggest that MEMPR, possibly with stakeholder input, should carry out a review of this topic and report its findings to the government. While it clearly lies with the government to set policy, if the government does wish to implement an ethanol fuel requirement, it would not be appropriate for it to be characterized as “renewable and low carbon” if that were not the case.

Available candidates as “renewable and low carbon” fuels

As discussed above, it may be difficult to find suitable candidate fuels. The BCSEA would be interested to know what information MEMPR has on the potential for “renewable and low carbon” fuels production in BC, what assessment MEMPR has made on such fuel markets outside BC, and how MEMPR has assessed the trade rule issues around specifying a fuel standard that would exclude ex-BC product.

Urgency and BC’s climate change plan

The BCSEA recognizes that there is an urgent need to implement measures to reduce greenhouse gases, and we applaud the government’s efforts to develop and effective climate change plan.

While we do not wish to discourage the pursuit of any measures to reduce greenhouse gas emissions, we believe the most effective measures in relation to transportation will be those which might reduce fossil fuel use to a small fraction of current levels. These would be measures such as radically stringent fuel efficiency standards (the government’s endorsement of the California standard is a welcome first step); technological efficiency standards that would shift us to electric and hybrid-electric vehicles; and planning measures that would reduce the amount of transportation needed (local food and materials sourcing; urban planning and transportation demand management).

Please don’t hesitate to contact me if you have any questions about this submission.

Sincerely,

Thomas Hackney
Vice-President for Policy

Attached: BCSEA’s letter of 12 February 2008 to MEMPR re draft revisions to BC’s Clean or Renewable Energy Guidelines

cc: Shelley Murphy
Edward Higginbottom