



Canfor Pulp Ltd.

January 5, 2018

Michael J. Rensing, Ph.D.
Director, Low Carbon Fuels
Electricity and Alternative Energy Division
PO Box 9314, Stn Prov Govt
V8W 9N1

Dear Mr. Rensing:

Thank you again for the opportunity to comment on the Pathway Assessment 2017 document.

As you are aware we are working on a production of a low carbon intensity product that will lend itself to a number of pathways.

Our general comments are that we would like to see the following concepts addressed in the regulations or mechanisms for compliance:

- 1) Credit mechanisms should be stackable with Federal LCFS initiatives. We would like to see mechanisms that benefit producers that are covered by both provincial and federal regulation versus those who are not.
- 2) We would like to see pathways to rail and marine transportation that will incent low carbon fuel use in those industries in addition to those already contemplated for road transportation.
- 3) We would like to encourage policy that would incent production of intermediate fuels in British Columbia – i.e. where the creator of an intermediate product produced locally can hold credits. The rationale of this would be to incent local development as well as to incent desired consumer behavior of converters.
- 4) Acknowledgement of carbon intensity reduction through the use of feedstocks that would otherwise be carbon emission sources. An example would be the use of wood wastes that would otherwise decompose and produce greenhouse gasses such as methane and NOx with significant impact multipliers.

Also we would suggest the following:

It might be useful to add another section in 9.2 regarding product Blending. There is an opportunity to blend HTL biocrude to targeted* fuel specifications, such as for medium-speed diesel engines (i.e. locomotive/marine) transport fuels. (e.g. CAN/CGSB-3.18-2010 (R2016): Diesel Fuel for Locomotive-Type Medium-Speed Diesel Engines).



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Section 9.2.1 Thermal treatment of biomass

This section should be expanded to specifically include hydrothermal-liquifaction of biomass. It should include a description of both pyrolysis bio-oil and HTL biocrude noting the differences. We would be happy to provide further information in this regard.

Yours truly,

A handwritten signature in black ink, consisting of several overlapping loops and curves, positioned below the text "Yours truly,".

James Spankie
Director, Biofuel Development