

From: Greg Overwater [REDACTED]
Sent: Monday, January 8, 2018 2:01 PM
To: Low Carbon Fuel Regulation EMPR:EX
Subject: Concerning the BC-LCFS Consultations - Comment for consideration from Global Automakers

Categories: Michael

To Whom It May Concern,

I apologize that this note concerning the LCFS is coming subsequent to the deadline for consultations, however Global Automakers of Canada, representing the 15 leading Import Manufacturers of Automobiles in Canada, would appreciate the government's consideration of the following brief points.

Global Automakers of Canada appreciates the general technical thoroughness that the *BC Low Carbon Fuels Compliance Pathway Assessment* provided to most of the issues concerning fuel-vehicle compatibility various fuel-environment scenarios. That having been said, the tone of the document – if not the technical detail, as not being a fuels expert I am not expertly qualified to make such an assessment – was such that it appeared to be particularly biased towards a desired outcome. That is, to say, that the comments provided by some of the industry stakeholders seem to have been disregarded out of hand. It may be that the weight of evidence points to a conclusion that the perceived risks increased biomass in petroleum fuels is overblown in some instances, however we do caution the Ministry to ensure that whatever the increased renewable content is decided upon, that it does not risk the performance and operation of the total on-road fleet. As the government is likely well-aware, the average age of a light duty vehicle on the road in Canada is now over a decade, and that means there is still a portion of the fleet on the road incompatibility with higher-ethanol blends, for example.

If the automotive industry is perceived as overly cautious with regards to vehicle-fuel compatibility, it is not without good reason, as it is the customer service lines of our members that usually bear the brunt of complaints concerning vehicle inoperability that can be traced back to fuel. And even when such issues can be traced to a source, it often takes weeks or months for service data to point to an issue, and weeks or months more to coordinate an investigation in coordination with fuel suppliers and then implement a solution – by which time the fuel issue may have been resolved independently but the consequences vis-à-vis impact to vehicle operability (on dozens, hundreds or even thousands of vehicles) still being felt. In the meantime, considerable resources have been devoted in attempting to satisfy our customers. Where smaller, independent fuel providers are concerned, this investigation process can be an even more onerous (often impossible) task and both vehicle OEMs and drivers are left “holding the bag”. With emission regulations tightening, and more advanced technology being required to meet these regulations, the industry needs access to consistently high-performing, reliable fuels.

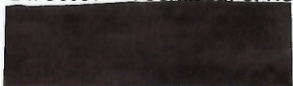
Secondly, concerning the education of the public around increased renewable content in fuels, we believe that while fuel distributors and retailers bear some responsibility to label their products appropriately, and vehicle manufacturers to provide the same through their owners' manuals and other labels, it cannot be assumed that consumers consistently consume this information of their own volition. Most are simply too busy, distracted by other activities or thoughts, or choose not to actively seek out such information; for this reason, we believe the government also has a role to play in communicating at large with the public concerning changes in public policy that will require them to pay more attention to their fueling choices. We therefore encourage the government to work with fuel

suppliers and manufacturers to provide consistent and complimentary messaging to consumers whenever a substantive change to fuel chemistry is made that may, through their choices at the pump, impact their short and/or long-term vehicle operability.

In summary, we have confidence that the Province has access to all of the qualified technical expertise it requires to make the appropriate decisions concerning renewable content in fuels for the light-duty and heavy-duty fleets, respectively. We ask only that a cautious approach always be taken with the implementation of changes to said content, and that industry voices be given due consideration, so that the impact to stakeholder business and vehicle operators is absolutely minimized.

Thank you for your consideration.

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