

British Columbia Low Carbon Fuel Standard Renewable Fuel Labelling Intentions Paper

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Introduction

British Columbia's Low Carbon Fuel Standard (LCFS) sets requirements that encourage the use of renewable and low carbon fuels and offers incentives to organizations that supply them. The [Low Carbon Fuels Act](#) (Act) together with the [Low Carbon Fuels \(General\) Regulation](#) (General Regulation) and the [Low Carbon Fuels \(Technical\) Regulation](#) (Technical Regulation) serve as the legal framework for the LCFS.

The Technical Regulation details technical requirements for the implementation of the LCFS, including renewable fuel labelling requirements at retail stations and commercial cardlocks across the Province. The Ministry of Energy and Climate Solutions (Ministry) is considering amendments to the labelling requirements under the Technical Regulation.

The Ministry is seeking feedback on the current renewable fuel labelling requirements and suggestions for improving label design requirements. Responses must be in writing; the subject or title of the written feedback submission should reference this Intentions Paper. For example: "Feedback on Labelling Requirements Intentions Paper" or similar wording to that effect will help Ministry staff direct your feedback to the correct policy team.

Feedback must be submitted by email or mail before 5 p.m. on January 16, 2026, to one of the following addresses:

Email: lcfs@gov.bc.ca

Mail: Low Carbon Fuels Branch
B.C. Ministry of Energy and Climate Solutions
P.O. Box 9314 Stn Prov Govt,
Victoria, B.C. V8W 9N1

This Intentions Paper has been posted online on the Consultations and Engagements page of the Ministry's website for public comment at: <https://gov.bc.ca/lowcarbonfuels>.

Background

The current renewable fuel labelling requirements are found under [sections 5 and 6](#) of the Technical Regulation. The purpose of the renewable fuel labelling requirements is to:

- provide transparency to consumers on the renewable content (i.e., ethanol or biodiesel) of fuel blends at the pump, to help make informed choices, and
- to standardize label design and content to present clear consistent information on renewable fuel content.

The current requirements specify the label design including the label material durability, font, text spacing, colour, and the percentage or range of percentages of the portion of renewable fuel content.

Non-compliance with the renewable fuel labeling requirements can lead to financial administrative penalties up to \$10,000. For more general information about LCFS administrative penalties, refer to [RLCF-021: Administrative Monetary Penalties](#) found on the LCFS website.

The LCFS has undergone significant updates and modernization since its introduction in 2008. However, the LCFS renewable labelling requirements have not changed since their introduction in 2011, which were developed with input from fuel suppliers and the public. The Ministry is seeking input from the public and any parties interested in updating the LCFS renewable fuel labelling design requirements.

Scope of engagement

What is in scope?

The following sections of the Technical Regulation are under consideration for amendment:

- Technical Regulation [Section 5 Labelling Requirements](#), providing requirements relating to the location of the label or alternatives to providing a label.
- Technical Regulation [Section 6 Labelling Requirements – Label Design](#), detailing most of the labelling design requirements.

What is not in scope?

The Ministry is not seeking feedback on the requirement for labelling itself set in section 11 of the Act, or of the penalties for non-compliance set out in section 29 of the Generation Regulation.

Requirement for labels

[Section 5](#) of the Technical Regulation requires anyone supplying gasoline with ethanol content greater than 10%, or diesel with biodiesel content greater than 5%, to adhere to renewable fuel labelling requirements.¹

There are two ways to inform consumers of the ethanol and biodiesel content of fuel under the Technical Regulation, depending on the type of final supply equipment (FSE). FSE is the final piece of equipment used to supply fuel to a consumer (e.g., fuel dispenser pump at a retail station or commercial cardlock).

FSE with volume and price display

Subsection 5 (2) sets requirements for the label on the FSE that displays the volume and price of the fuel (e.g., retail fuel dispenser). These requirements are:

- The label must be posted on the supply equipment near where the volume and price are displayed, so that the label is visible to a person to whom the volume and price are visible,
- the label must be in good condition, and
- the label must meet the design requirements specified in section 6 of the Technical Regulation.

The design requirements will be explained further in this document under the section titled [Section 6 of the Technical Regulation](#).

FSE without volume and price display

Subsection 5 (3) provides for the situation where a person who supplies fuel through a FSE not described in section 5 (2). The supplier is required to give the consumer a notice in the form of an invoice, bill of lading, shipping paper or other document that clearly sets out, as a percentage or range of percentages, the portion of biodiesel or ethanol, as applicable, that is contained in the fuel mixture.

This subsection does not set requirements relating to the design of the notice, only that the notice clearly sets out the portion biodiesel or ethanol, as applicable, as a percentage or range of percentages.

¹ There is no renewable fuel labelling requirement for renewable diesel, which is fully interoperable with traditional fossil diesel fuel.

Design of labels

[Section 6](#) of the Technical Regulation provides the design requirements for the label that must be present on FSE's that display the volume and price of fuel, as per [subsection 5 \(2\)](#). The current requirements are described below; an example is provided in Appendix A.

Label durability

Paragraph 6 (1) (a) of the Technical Regulation describes the label durability expectations. The label must be able to withstand extremes of weather for at least one year and be resistant to water, automotive fuel (e.g., gasoline or diesel), oil, grease, solvents and detergents.

Label dimensions, colours and font

Paragraph 6 (1) (b) and subsection 6 (2) of the Technical Regulation list the detailed requirements of the label design, as follows:

Label Section	Minimum Height	Background Colour	Text Colour	Font
Top Band	2.5 cm	Black	Ethanol: non-fade orange: PMS 1495 ¹	Size: 18 point minimum. Layout: 0.3 cm minimum from the label edges; and centered horizontally and vertically within the band. Font type: Arial Bold or Helvetica Bold .
			Biodiesel: non-fade blue: PMS 277 ²	
Bottom Band	4.0 cm	Ethanol: non-fade orange: PMS 1495 ¹	Black	Size: 14 point minimum. Layout: 0.3 cm minimum from the label edges; and centered horizontally and vertically within the band. Font type: Arial Bold or Helvetica Bold .
		Biodiesel: non-fade blue: PMS 277 ²		
¹ PMS 1495 = Pantone Matching System (PMS) 1495 C Colour, equivalent to RGB(255,143,28)				
² PMS 277 = Pantone Matching System (PMS) 277 C Colour, equivalent to RGB(171,202,233)				

The Ministry has received requests to review the label design requirements, particularly concerning the narrow scope of required font types, text spacing, and colours. For example, the required use of the colour orange for labelling ethanol content, which may be commonly associated with warning or caution, has raised concerns that this colour choice may unintentionally convey a warning to consumers, when instead ethanol is proven to lower greenhouse gas emissions and provide engine cleaning benefits.

The intention of the labelling requirements is to clearly and consistently provide information to consumers about fuel blends. The Ministry is considering relaxing the label design requirements with respect to colour requirements, specific band widths, specific fonts, and edge spacing, while still maintaining readability and visibility.

Label text

The label text requirements for FSE labels are listed under paragraph 6 (1) (c) of the Technical Regulation. The current requirements are described below; an example is provided in Appendix A.

The label must set out, as a percentage or range of percentages, the portion of renewable fuel (biodiesel or ethanol, as applicable) contained in the fuel.

The text on the label must use words or expressions approved by the director, which are published on a publicly accessible website. In this case, Information Bulletin RLCF-004 Labelling Requirements on the [LCFS Information Bulletin webpage](#), clearly lists the approved label text. The current approved label text is as follows:

- For gasoline with ethanol content exceeding 10 percent, the label text must state:
 - Contains ## percent ethanol; or
 - Contains between ## and ## percent ethanol.
- For diesel with biodiesel content exceeding 5 percent, the label text must state:
 - Contains ## percent biodiesel; or
 - Contains between ## and ## percent biodiesel.

Ministry staff have received requests to consider different wording or phrasing for the labels. Prescribing label text is important for consistency and clarity for consumers. It is important for labels to continue to provide transparency to consumers with respect to the level of renewable content (i.e., ethanol or biodiesel) contained within fuel blends. Recommendations for possible alternatives to the currently prescribed wording should include a clear rationale for the requested changes.

Next steps

The Ministry encourages feedback to improve labelling requirements and enable greater offerings of renewable fuel blends to consumers. The Ministry is particularly interested in feedback on label, colour, location and text. Instructions on how to provide feedback are provided at the beginning of this document.

The Ministry will review the feedback received and may follow up with individuals providing feedback to request additional information or clarification. Following the analysis, further engagement and collaboration with interested parties may occur on this topic. The feedback, analysis, and recommendations may be used to develop regulatory changes for approval by the Minister and/or Cabinet.

Appendix A: Label examples

Labels for FSE with volume and price display

Below is an example of labels which meet the current text and colour requirements.

Gasoline with ethanol content exceeding 10 percent:



Diesel with biodiesel content exceeding 5 percent:

