

Comments and Responses to the Ensyn LCFS Method 2 Fuel Pathway

Comments

Comment 1

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While the general goal of this application seems reasonable and even supportive of statewide sustainability goals, I believe that there is an unacceptable risk of creating perverse incentives that may promote deforestation when incentives to utilize forest residue are given. I strongly urge ARB to reconsider certification of fuels from forest residues until the agency has the appropriate capacity and authority to monitor and verify that it is not causing deforestation or loss of forest carbon stock.

Comment 2

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I urge ARB to reconsider certification of fuels from forest residues until the agency has the appropriate capacity and authority to monitor and verify that it is not causing deforestation or loss of forest carbon stock.

Applicant's response to the Method 2 Fuel Pathway

The following is respectfully submitted by Ensyn in response to the LCFS comments.

1. The carbon forest feedstock supply is healthy and sustainable:

With respect to Canada, 94% of Canadian forests are publicly owned and are directly governed by forest management and sustainability laws. In addition to strong legal governance, Canada has the largest area of third party certified sustainable forest in the world. Since it emerged in the 1990's, forest management and sustainability certification has been quickly adopted and includes almost 50% of the country's forests (and growing at a rate above 10% p.a., similar to that in the USA).

2. The Method does not threaten the forest carbon stock:

The pathway uses cellulosic-based feedstocks (non-food based feedstocks) that come from sustainably-managed biomass resources. It should also be noted that in practice, the Method employs a chain-of-custody program to track the source of feedstock to ensure that only certifiable managed and sustainable

forest practices are utilized. This program includes third-party monitoring by Genscape.

3. The Method is compatible with forest management practices and utilizes recognized sustainability programs and policies

The currently published LCFS pathway falls within the Crown Forest Sustainability Act (CFSA) and utilizes feedstock under a certified management/sustainability program the Forest Stewardship Council (FSC). In addition, any future projects will use forest feedstock from similar managed and sustainable sources.

ARB response and action

ARB is in the process of implementing a monitoring and verification program under the LCFS to ensure that the applicant will harvest and utilize forest residues in a sustainable manner preventing adverse environmental impacts such as deforestation. This will include traceability of feedstocks used in the production of transportation fuels for the LCFS program. In advance of rolling out such a program, ARB will exercise its rights to audit the applicant under the existing enforcement provisions in the regulation. Provisions will be available (both near-term and long-term) to ensure compliance with information provided in the application. Therefore, staff recommends the Ensyn application be certified as a prospective pathway.