

LCFS Advisory Panel Priorities: Dr Chris Malins of the ICCT

1. Advances and likely advances in technologies to produce ultralow carbon fuels (*required element 4*)
2. A consideration of appropriate strategies to promote the market penetration of ultralow carbon fuels (*required element 5*)
3. Identification of hurdles or barriers (*required element 11*)
4. Advances in fuel-lifecycle assessment, with particular regard to the indirect impacts of potentially ultralow carbon fuels from new technologies (*required element 3*)
5. Opportunities to support greater harmonisation with other federal, regional and international programs (*required element 13*) Explanatory note:

I believe that promoting the availability of ultralow carbon fuels will be key to the ability of California to meet the 2020 LCFS targets, and also in optimising the potential of the LCFS program to 2020 to provide a launchpad to more substantial GHG emissions reductions in the years following. In this context, identifying the technologies with the capacity to deliver ultralow carbon fuels industries for California in the medium to long term, and identifying the regulatory measures that would support the growth of these industries is vital. The first, second and third points I have identified fit within this context.

Having said this, the debate around indirect land use change should be taken as a cautionary example of the need to fully assess the net emissions implications of a new policy. The Advisory Panel should therefore take care to ensure that the identification metrics for ultralow carbon fuels are based on the best available fuel-lifecycle practice, and pay proper attention to the economically mediated indirect consequences of exploiting new feedstock streams (my fourth point).

Finally, as fuels lead for the International Council on Clean Transportation, I am keenly aware of the potential for linkages between groundbreaking regulatory programs such as the LCFS in California and regulatory programs in other jurisdictions. Examining opportunities for international harmonisation can help California manage the risk to the LCFS's policy goals from leakage and shuffling, as well as opening the possibility of learning from policy successes (and failures) in other regions. This is my fifth point.

On a general note, I would like to emphasise that I think it is important that the Advisory Panel should remain forward looking and focused on opportunities for developing and building on the Standard, rather than spending undue time revisiting old discussions or questioning the fundamentals of the policy.

