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September 30, 2020

VIA ELECTRONIC MAIL

President Donald J. Trump
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500
president@whitehouse.gov

Re: Renewable Fuel Standard – Canola Oil Renewable Diesel Pathways

Dear Mr. President:

On March 12, 2020, the U.S. Canola Association (USCA) submitted a petition to the U.S. Environmental Protection Agency (EPA) requesting that it establish pathways for renewable diesel derived from canola oil to generate Renewable Identification Numbers (RINs) as “advanced biofuel” under the Renewable Fuel Standard (RFS) program. As evidenced by the entities submitting this letter, the canola renewable diesel petition is a rare case of alignment of agriculture, biofuels, and petroleum interests on an RFS issue. The petition was submitted based on conversations with EPA staff, but supplements an original request from the canola industry all the way back in 2010. We urge you to request that EPA act promptly to approve the requested pathways as soon as possible.

Canola oil is a viable alternative feedstock for renewable diesel production but will not be utilized if it is not eligible to generate “advanced biofuel” RINs under the RFS program. Renewable diesel production in the United States has grown since 2010 and is expected to grow substantially in the next couple of years based on planned investments by fuel producers, thus making approval of this pathway of immediate importance.

In 2011, EPA reports there was approximately 62 million gallons of U.S. renewable diesel production. Renewable diesel production capacity in the United States is likely to be around 2 billion gallons by 2022, with more planned facilities expected, including converting idled petroleum refineries that would save jobs and continue to diversify this country’s energy sources to the benefit of consumers. These facilities are or will be located across the country, including, but not limited to, California, Louisiana, Nevada, New Mexico, North Dakota, Oklahoma, Texas, and Wyoming.

There remains growing demand for low sulfur diesel and lower carbon fuels. Renewable diesel creates good opportunities because it is considered a “drop-in” fuel that is chemically like petroleum-based diesel, and, therefore, can be used in existing infrastructure and vehicles. EPA

claims to prioritize approval of “drop-in” biofuels under the RFS program and fuels commercially available. Approving canola oil renewable diesel pathways would diversify the feedstocks available for renewable diesel production to help meet this growing demand. This gives renewable diesel producers greater flexibility and helps reduce price volatility. It allows facilities to take advantage of cost-efficiencies based on market indicators, such as reduced feedstock transportation costs and credit generation under state low carbon fuel standards based on canola oil’s carbon intensity scores.

EPA action approving the USCA petition would also help farmers, who continue to struggle during these difficult economic times. For existing canola producers, EPA’s action would “level the playing field” between canola and similar crops and allow the market to work. Canola is also an ideal crop that can be used in rotation with other crops, improving their yields, diversifying their markets and providing added value for farmers.

EPA’s approval of these pathways would be a “win-win” for farmers, feedstock processors, renewable fuel producers and obligated parties alike. Current investments and plans for renewable diesel must consider available feedstocks and the time for action is now. The proposed pathways would not impose costs on regulated entities but could, in fact, help them reduce their compliance costs and bring benefits to the rural economy. We appreciate EPA’s work on the issue, and re-iterate our request for your support in this effort and have EPA issue a proposal approving the requested pathways as soon as possible.

We thank you in advance for your consideration.

Respectfully yours,



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