

July 18, 2025

Ministry of Environment, Conservation, and Parks

Climate Change Programs and Partnerships Branch

Via Email:

Stephanie.McGill@ontario.ca

Re: *Cleaner Transportation Fuels: Proposed Domestic Renewable Content Requirement for Diesel Fuel as proposed in ERO025-0669*

ADM Agri-Industries appreciates the opportunity to comment on Ontario's proposed Domestic Renewable Content Requirement for Diesel Fuel under the Cleaner Transportation Fuel Regulation (CTFR).

ADM Agri-Industries has 425 employees in Ontario. In our Windsor, ON, crushing facility, we process Canadian soybeans and canola seed into high-protein meal and vegetable oils for food, biofuel, and industrial uses. We employ 160 in Windsor, while interacting with over 3000 farmers throughout Ontario. Corn and wheat move through our Windsor Export Grain terminal while Ontario wheat farmers are valuable suppliers for our Mississauga, Port Colborne and Midland, Ontario flour mills. Since 2013, we have also operated a dedicated canola crush facility and integrated biodiesel plant in Lloydminster, AB, with 110 employees and annual capacity exceeding 320 million liters.

We commend Ontario's leadership in advancing Canadian agriculture, energy, and transportation through clear biofuels policy. The proposed domestic content requirement would support Canadian biofuel producers and reinforce the environmental, economic, and public health benefits of clean liquid fuels.

We support implementing a 4% domestic biobased diesel requirement effective January 1, 2026. This aligns with the current 4% blending mandate while clearly signaling support for Canadian production.

Additionally, we recommend increasing the overall biobased diesel requirement to 5% by the same date. This would expand market opportunities for Canadian producers, stimulate investment, and enhance price discovery through broader market access.


We encourage Ontario to remain flexible and responsive to evolving international policies, including those of the United States, to ensure alignment and minimize disruption.

To address potential consumer price concerns, we recommend that MECP enhance transparency in fuel and credit pricing and improve market data reporting. Timely and accurate data will support efficient market function and help mitigate volatility.

Ontario's efforts to promote a sustainable circular economy by utilizing various waste streams to produce renewable fuels are evident in the proposal. We also want to stress the importance of maintaining feedstock and technology neutrality under the CTFR. This approach maintains the focus on waste feedstocks but also benefits Canadian canola and soybean growers, while providing all biofuels producers feedstock source flexibility and fostering sustainable growth in biobased diesel infrastructure.

Thank you for the opportunity to provide input. We align our comments with those of Advanced Biofuels Canada (ABFC) and welcome any follow-up.

Respectfully,

A handwritten signature in black ink that reads "kevin wright" in a cursive, lowercase style.

Kevin Wright
Canada – Country Manager
ADM Agri-Industries

CC: Fred Ghatala, President, Advanced Biofuels Canada (ABFC)