



Canada Gazette, Part I, April 10, 2010
c/o Chief, Fuels Section
Oil, Gas and Alternative Energy Division
Energy and Transportation Directorate
Department of the Environment
Gatineau, Quebec
K1A 0H3

Friday June 4, 2010

RE: Support for Renewable Fuel Standard Regulations

201- 8 York Street
Ottawa, ON
K1N 5S6
Ph 613-233-9954

www.ggc-pgc.ca

Members:

Alberta Barley
Commission

Alberta Grain
Commission

Alberta Oat Rye &
Triticale Association

Alberta Pulse Growers

Alberta Winter Wheat
Producers Commission

Atlantic Grains Council

British Columbia Grain
Producers Association

Canadian Canola
Growers Association

Manitoba Corn Growers
Association

Prairie Oat Growers
Association

Western Barley
Growers Association

Western Canadian
Wheat Growers
Association

Dear Sir/Madam,

I am writing to you on behalf of the Grain Growers of Canada, who represent over 80,000 successful farmers through its membership organizations who grow wheat, oats, barley, canola, corn, peas, lentils and triticale.

We wish to express our support for the Renewable Fuels Standard (RFS) regulations, which are proposed to come into effect September 1, 2010. The RFS is a critical regulatory lever that guarantees market access for renewable fuels. This, in turn creates significant economic and environmental benefits. In particular, the RFS regulations are a boon to rural Canada, the agricultural sector and farm families like my own.

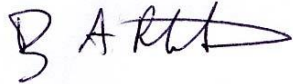
The benefits of renewable fuels find their way to farmers across Canada. Support of the sector through RFS regulations ensures the expansion of market options and investment, and increases prices and crop yields. As is the Grain Growers motto, we do not believe in handouts, but we believe in a policy environment that allows farmers to make a living. RFS regulations contribute to that policy environment.

There are clear benefits of RFS regulations to Canadian farmers. In that respect, we would like to take issue with a set of studies that suggest this is not the case. The recently released Regulatory Impact Analysis Statement and its companion Cost Benefit Analysis (CBA), both generated by Environment Canada (EC) appear to understate the benefits and exaggerate the costs of the renewable fuels sector. There are obvious flaws in these studies which include and underestimation of gasoline pricing, overestimation of ethanol pricing, double counting costs and underestimation of the price of carbon.

The bottom line is that there should be no valid reason to suggest the contribution of the Canadian renewable fuels sector is anything short of significant and growing

We strongly urge you to please press forward with the RFS regulations. It is a step forward in the right direction for farmers across Canada.

Sincerely,

A handwritten signature in black ink, appearing to read "D Robertson". The signature is stylized with a large, looped initial "D" and a long, horizontal stroke at the end.

Doug Robertson
President
Grain Growers of Canada