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Lack of Transparency and Data for Renewable Diesel

Additional submitted attachment is included below.



February 5, 2026

David Hochschild, Chair
Siva Gunda, Vice Chair
Commissioners
California Energy Commission
715 P Street
Sacramento, CA 95814

Submitted online via <https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=23-SB-02>

**Re: California Energy Commission (CEC) Docket #23-SB-02 regarding SB X1-2 Implementation –
Lack of Transparency and Data for ‘Renewable Diesel’**

Esteemed Chair, Vice Chair, and Commissioners:

Please accept this comment letter on the California Energy Commission (CEC) Docket #23-SB-02 regarding SB X1-2 Implementation.

Biofuelwatch¹ is an international organization that works to increase public understanding and civic engagement on the land-use implications of climate policy. We have a particular focus on the environmental harms and social inequities of large-scale industrial bioenergy projects, and we work extensively on addressing the negative ecological and social outcomes of policy and actions that are justified as being beneficial to the global climate, yet carry with them risks and threats to public health and safety, economic stability and natural resources.

In the years since the founding of our organization in 2008 we have been working in a multitude of jurisdictions around the world to strengthen public and citizen participation in land-based energy and resource management decision making. We have a great deal of experience in California, and this is by no means the first time we are engaging on issues related to liquid biofuels. Our organization was closely involved with tracking the extremely irregular governance in Contra Costa County of the environmental review permitting of both the Phillips 66 biofuel refinery in Rodeo and the Neste-Marathon joint venture biofuel refinery in Martinez. We have presented substantial evidence to local and state authorities, including the CEC², challenging the flawed science and erroneous assumptions relied upon to characterize biofuel products like ‘renewable diesel’ as a ‘clean’ and ‘low emissions’ alternative. We also have real world experience on the ground in the communities where these refineries are located.

This letter is strongly focused on the matter of ‘renewable diesel’ and articulates concerns regarding the dramatic lack of detailed information available from the CEC regarding this transportation fuel product.

¹ <http://www.biofuelwatch.org.uk/>

² <https://efiling.energy.ca.gov/getdocument.aspx?tn=234372>

The emergence of so-called ‘renewable diesel’ as a major factor in the California transportation fuels market has occurred in a virtual informational black box, with broad unsubstantiated claims made by the CEC about the benefits of the uptake of the liquid bioenergy product. At the same time the CEC is failing to provide crucial data and analysis that would help explain the economic impacts and energy supply risks arising from the recent explosion in the manufacture, import and consumption of this liquid biofuel product in the state.

One result of the lack of transparency and the paucity of data regarding ‘renewable diesel’ is that the effectiveness of the SB X1-2 Implementation process is gravely handicapped by the failure to assess and address the real-world impacts of the emergence in the last several years of this liquid biofuel product.

The impacts from California’s aggressive pivot to biofuels are far ranging and include the degradation of global forests, the loss of biodiversity, water and air pollution impacts, the exacerbation of food insecurity and hunger, and a lock-in of carbon intensive combustion-oriented transportation technologies – not to mention elevated gas prices at home in California. But none of these concerns have yet been adequately taken into consideration by the CEC. To make the situation worse the agency has not yet to this date provided adequate information about the manufacture and distribution of this liquid biofuel product in order that the interested public can analyze data and suggest policy remedies.

How do we know that the emergence of ‘renewable diesel’ merits far more attention than it has been receiving? We can refer to the June 2025 response letter from CEC Vice Chair Gunda to California Governor Gavin Newsom³ to highlight how the CEC itself has elevated the importance of ‘renewable diesel’ to the SB X1-2 Implementation process, but has failed completely to provide relevant data.

That letter includes:

- A specific reference to how the conversion of refineries in the Bay Area to making liquid biofuels ‘have also reduced gasoline refining capacity in the state’ (p.8)
- A reference to how more than 2 billion gallons of renewable diesel have been burned, with more than 70% of diesel needs in the state being met by renewable diesel (p.5)

Despite these notable references to the clearly significant market and refining capacity dynamics associated with the rapid growth in production, import and consumption of renewable diesel, the June 2025 letter to the Governor says nothing more about ‘renewable diesel.’

Interestingly enough, it is not only in that letter where the CEC erases the matter of biofuels from the discussion.

Note that the two converted refineries that were referenced in the June 2025 CEC letter to the Governor are actually characterized as being ‘idled’ refineries⁴ on the CEC website. On a different page of the CEC website (“California Oil Refineries”) a full listing of operating refineries is offered, but neither of the SF Bay Area biofuel refineries are listed⁵. **The CEC does not however offer any listing of biofuel refineries.**

³ https://www.energy.ca.gov/sites/default/files/2025-07/CEC%27s_Response_to_Governor_Newsom%27s_Letter_June-27-2025_ada.pdf

⁴ <https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/californias-oil-refineries/california-oil>

⁵ <https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/californias-oil-refineries>

Nor is there any information on the CEC website about feedstocks that are coming into those biofuel refineries, neither in terms of feedstock type, amount, or point of origin. This contrasts markedly with the information regarding crude oil feedstocks; while rudimentary, the information that the CEC website makes available regarding crude sourcing for the California refinery sector at least opens the discussion for the public to be informed about the mechanics of the manufacture of transportation fuel in the state.

The CEC offers no substantive information regarding ‘renewable diesel’ despite the stated fact that more than 70% of the diesel being consumed in the state is so-called ‘renewable diesel.’

This lack of adequate and useful information about ‘renewable diesel’ is a failing that is not limited to the website, it is also embedded in the reporting from the CEC on transportation fuels.

Let’s take the CEC Quarterly Petroleum and Pricing Report for January 2025 through March 2025⁶ as an example. In this report CEC staff state that

“the permanent idling of Marathon Martinez in August 2020 and the completion of Phillips 66 Rodeo’s conversion from conventional fuel production to renewable fuels in the first quarter of 2024 reduced refining capacity and lowered overall diesel production. Renewable diesel production is not collected nor included in these figures, which substantially increases the amount of fuel available for diesel powered vehicles.”

Besides the confusion at the CEC about the current status of the Neste-Marathon joint venture biofuel refinery in Martinez, this statement is both remarkable for what it does state (that the conversion of refineries to biofuels impacts refining capacity in the state) and for what it does not do (renewable diesel production is not collected nor included in these figures, even though it is increasing the amount of fuel available).

In this instance the CEC is simply admitting that there is a lack of data on ‘renewable diesel’ production in the state, and that the agency has not yet made a plan to collect that data.

This lack of data is also associated with the issue of imports of ‘renewable diesel’ into California. While the CEC has in many instances asserted that the import of refined fuels into California is of great concern that requires high level political attention, **the CEC makes no effort to distinguish how much of that refined liquid fuel product being imported into California is ‘renewable diesel’.** Without this data about imports of ‘renewable diesel’ it is impossible to make an informed analysis regarding real world questions of how the transportation fuels sector is operating in California, and how fuel imports affect that operation.

Nevertheless, we know that in 2024 record amounts of ‘renewable diesel’ were imported by Neste into California from their refinery in Singapore⁷ – until those imports cratered due to operational and maintenance issues at that same refinery⁸.

Without taking much time to elaborate on the concerns associated with the reliance of Neste on using a feedstock commodity (Palm Fatty Acid Distillate – PFAD) acquired from the refining of virgin palm oil for

⁶ <https://www.energy.ca.gov/sites/default/files/2025-08/CEC-200-2025-020.pdf>

⁷ https://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=PET&s=M_EPOORDO_IMO_NUS-NSN_MBBL&f=M

⁸ <https://www.spglobal.com/energy/en/news-research/latest-news/agriculture/101724-nestes-singapore-diesel-line-shuts-over-equipment-failure-raising-global-supply-disruption-concerns>

making that ‘renewable diesel’ product that is being imported to California for consumption (i.e. burning), we are alarmed that **never once has the CEC offered any analysis or insights regarding what it might mean for California to be reliant on the imports of ‘renewable diesel’ made at a refinery in a foreign country that is seemingly suffering from systematic production upsets.**

Failing to provide adequate information is not a viable approach to assessing how transportation fuel production and distribution is working in the real world in this state. The CEC has a bottom-line mission to gather relevant data and to make that data available to the public and to decision makers to inform the development of effective policy.

But when it comes to ‘renewable diesel’ the CEC is flying blind. One can therefore extrapolate to the larger decision-making apparatus in state agencies and the legislature: that if the CEC has blinders to the implications and ramifications associated with the massive uptake of ‘renewable diesel’ in the state, then we must assume that other decision makers cannot see what is happening either.

Thus, **our recommendation is that the CEC make an immediate priority of being able to provide accurate information about ‘renewable diesel’ in California.** This includes at a minimum:

- what feedstocks are being used, how much, how they are arriving and where they have come from
- how much ‘renewable diesel’ (and/or ‘sustainable aviation fuel’) is actually being made in California, where it is made, and how and where it is being distributed
- how the production of ‘renewable diesel’ and/or ‘sustainable aviation fuel’ in converted refineries in California affects refining capacity for other products, such as gasoline
- how much ‘renewable diesel’ is being imported into California, as well as where that fuel product is coming from, how it arrives, and what feedstocks are being used to make that fuel
- affordability issues, including the impact on food prices attributable to biofuel production

It is past time to end the information black out on the production, import, sales and consumption of ‘renewable diesel’ in the state. Without this information it is impossible to assess the actual status of transportation fuel production and consumption patterns in California.

The time for scrutinizing the claimed climate and air quality benefits of ‘renewable diesel’ has also arrived. We cannot afford to operate on assurances from industry lobbyists that biofuels are good for the air and climate when contemporary science is making it clear that scaling up biofuels results in indisputable air quality impacts⁹ and will only make the global climate and biodiversity crisis worse faster¹⁰.

The CEC must take responsibility and provide full and accurate information about ‘renewable diesel’ in California. There is no more time to lose.

Thank you for your attention to these comments.



Gary Graham Hughes, Co - Director / Americas Program Coordinator, Biofuelwatch
garyhughes.bfw@gmail.com / +1-707-223-5434

⁹ https://environmentalintegrity.org/wp-content/uploads/2024/06/EIP_Report_FarmtoFumes_06.12.2024.pdf

¹⁰ <https://agdatanews.substack.com/p/using-vegetable-oils-for-biofuel>