

Global Clean Energy Holdings
Sustainable Oils
Feedstock-only Carbon Intensity for Camelina
Response to Comments

March 9, 2015

The Sustainable Oils feedstock-only carbon intensity application was posted to the California Low Carbon Fuels Standard (LCFS) web site¹ for comment on November 12, 2014. Two comment letters were received. Both were supportive of the proposed camelina feedstock CI. Comment letter 22, from three non-governmental organizations², contained one substantive comment which, under section 95486(f)(3)(E) of the LCFS regulation, requires a response.

Comment: “The applicant mentions the potential for livestock feed to be produced as a by-production or co-product of Camelina biofuels production, but no calculation was included. We are assuming that there is not a livestock feed currently produced but want to ensure consistency between pathways. Under other feedstock pathways, ARB’s approach has typically been to assign a co-production credit.”

Response: Like soybean and canola, camelina is an oilseed. Oilseeds consist primarily of meal, which is often used as a livestock feed supplement, and oil. If camelina oil is used as a bio- or renewable diesel feedstock and the meal associated with that oil is used as a livestock feed supplement, that meal can be considered to be a co-product of the bio- or renewable diesel production process. Bio- and renewable diesel fuel pathway applicants who use the Sustainable Oils feedstock CI in their life cycle analyses can include a credit for the associated camelina meal if that meal is used in livestock feed rations. Oilseed meal co-product credits have usually been calculated based on the relative mass of the meal in the oilseed, but applicants are free to propose alternative approaches.

¹ <http://www.arb.ca.gov/fuels/lcfs/2a2b/2a-2b-com.htm>.

² The Natural Resources Defense Council, the National Wildlife Federation, and the Union of Concerned Scientists