

We have had a look at the presentation and we still hope that ARB moves toward a third party system sustainability and GHG emission calculation.

The document is from our point of view yet not very specific regarding GHG emission calculations from agricultural level to the final biofuels, sustainability issues along the supply chains and traceability. This is of particular relevance for California's imports.

Experience has also shown that it is essential for credibility, avoidance of fraud and for continuous improvements to have both certification bodies and a certification system place. Certification schemes can ensure that the standard requirements are being implemented across the certification bodies on a certain level.

Certification systems ensure a balance of power between certification body and companies to be certified, and the standard requirements, as e.g. being defined by authorities.

We are very much looking forward to the results of today's workshop, and are happy to further assist as required.

Best,

Norbert