

From: [Dorothee Luisa Polzer](#)
To: [ARB LCFS Workshop](#)
Subject: Verification Program - comments on workshop
Date: Monday, June 06, 2016 7:48:28 AM

Dear Ursula,

Please find below some comments regarding the Verification Program, presented on the June 2, 2016 workshop:

1. Unannounced audits: to have an optimized audit it is important to be announced, so the person responsible at the facility can be free to receive the auditor and also request the areas to have their agenda free on the audit day so the documents and process can be shown promptly.
2. All LCFS participants required to undergo LCFS Verifications: there are facilities register under LCFS program which didn't export ethanol to California some year, in this case the audit shouldn't be required, since the facility didn't export to California.
3. Validation Verification Scope: the facilities already attempt to audits for RFS2 program, like the engineering review each 3 years and the QAP audit yearly. The same visit and verification could be used for LCFS verification program, so the time and costs are optimized. Also, some facilities are Bonsucro certified, so the yearly audit for the certification could be acceptable for the verification.
4. CI calculations using CA-GREET would be part of the Verification Scope: the verification of the CI calculation could be on a larger frequency than yearly, since the calculation and CI isn't changed yearly and would be the same.
5. Would the audit be a mandatory program or voluntary like QPA (RFS2)?

Thank you.

Best regards,

Dorothee Luisa Polzer
Sustentabilidade



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