

**From:** [Leticia Phillips](#)  
**To:** [Lai, Ursula@ARB](mailto:Lai_Ursula@ARB); [ARB LCFS Workshop](#)  
**Subject:** UNICA's comments on the Oct 21 workshop  
**Date:** Monday, November 21, 2016 12:33:35 PM

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Dear Ursula,

The Brazilian Sugarcane Industry Association (UNICA) appreciates the opportunity to comment on the information released on the October 21th workshop and White Paper. Given the complexity of a Verification Program as the one CARB is proposing to create, UNICA is glad to see that staff have decided to postpone this process until next year. We feel that this extra time and the fuel-specific workshops approach are necessary to ensure that these changes are fully discussed. Some of the concerns regarding amendments and new programs being considered, expressed to you by UNICA in the June 16th and August 12th correspondences still stand, and we look forward to discussing them with you during the workshops next year. We appreciate CARB's consideration to make an effort to harmonize its program with others already in place, as we feel that this opportunity will only benefit all parties involved, both in terms of capital as in terms of human resources savings. We would like to request that staff post fuel-specific workshops dates as soon as possible, as some of the interested parties are outside California and/or abroad and would like to participate in person.

As usual, UNICA appreciates CARB's continuing efforts to optimize and improve the LCFS, and we are at CARB's disposal to respond and clarify any question staff may have regarding how the sugarcane industry work in Brazil, as we believe such understanding is crucial for the continuing development of the policies that govern the LCFS.

I believe we all share the same goal of ensuring that California receives low carbon fuels, like sugarcane ethanol from Brazil, so we can accomplish the goals of the LCFS program.

WE look forward to fully participating in this process and helping staff ensure the successful implementation of the LCFS.

Sincerely,

Leticia

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Representative - North America

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