

June 24, 2022

Clerks' Office
California Air Resources Board
1001 I Street
Sacramento, California 95814

Submitted electronically to: cotb@arb.ca.gov

RE: Canola Council of Canada's Comments on Draft 2022 Scoping Plan Update

To whom it may concern,

The Canola Council of Canada (CCC) appreciates the opportunity to submit comments to the California Air Resources Board (CARB) in response to the Draft 2022 Scoping Plan Update (the Plan).

The CCC is a non-profit industry association representing all sectors of the Canadian canola industry, including seed developers, farmers, exporters, and processors. The CCC's mission is to advance the growth and profitability of the canola industry based on innovation, sustainability, resilience, and the creation of superior value to customers throughout the world. California is among canola's largest and most important customers, with consumption of canola oil and meal valued at \$800 million in 2021. Canola oil has long been regarded as one of the healthiest cooking oils available and is increasingly recognized as a superior feedstock in renewable fuel production.

We are pleased to see that the Plan proposes to initiate a public process focused on options to increase the stringency and scope of the Low Carbon Fuel Standard (LCFS). Furthermore, it is encouraging that the positive contribution of natural and working lands in reducing GHG emissions is reflected in the Plan. GHG emission reductions from natural and working lands can be incentivized through the LCFS by incorporating low carbon farm practices into the carbon intensity calculations of crop-based biofuels.

Canola's advantage in renewable fuel production stems from the crop's photosynthetic process of capturing / utilizing carbon from the atmosphere and the ability to store the carbon in the soil via sustainable farm practices such as minimal/zero tillage and summer fallow conversion. These practices have led to higher levels of soil organic carbon (SOC) and are accounted for in Canada's National Inventory Report as annual emission removals. SOC and corresponding emission removals have been scientifically measured and verified in Canada for several decades and are reflected in the carbon intensity calculations for biofuels sold under the British Columbia LCFS and the coming federal Clean Fuel Regulation (CFR).

Details on Canada's approach to SOC and its linkage to carbon intensity scoring and biofuel policies can be found in attached study titled "*Soil Organic Carbon, Carbon Intensity, and Canadian Canola*".

As CARB initiates updates to the LCFS program, we recommend that low carbon farming practices be included in the life cycle assessment of crop-based renewable fuels. We also encourage CARB to collaborate with both provincial and federal regulators in Canada, who have captured the benefits of SOC in low carbon fuels standards.

We would welcome an opportunity to meet with CARB officials to discuss details of the attached study and further explain how updates to the LCFS can help incentivize GHG emission reductions from natural and working lands.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Everson', with a long horizontal flourish extending to the right.

Jim Everson
President
Canola Council of Canada