

From: Dorothee Luisa Polzer
To: [ARB Clerk of the Board](#)
Subject: Comments on proposed amendments
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Attachments: [image001.png](#)

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To Whom It May Concern,

Copersucar S.A. is a global leader in trading sugar and ethanol and Brazil's largest exporter of these products. From its headquarters in São Paulo, it operates a business model that is unique in the world: a privately held joint stock corporation whose members are, at the same time, both partners and suppliers. The company was established in 2008 by members of the Cooperativa de Produtores de Cana-de-açúcar, Açúcar e Álcool do Estado de São Paulo (Cooperative of Sugarcane, Sugar and Alcohol Producers of the State of São Paulo). In addition to the exclusive right to market sugar and ethanol produced by the 35 partner production units, the company offers the market ethanol originated from other sources, in Brazil and abroad.

Copersucar would like to provide comments related to the harvesting mechanization aspect.

The mills at South-Central region of Brazil has increase significantly its harvest mechanization percentage over the last decade. The increase in São Paulo state was supported by the commitment, Green Ethanol Protocol, of the mills to eliminated pre-harvest field burning in 2017. The actual mechanization percentage in South-Central region of Brazil is higher than the default values proposed for the calculator, 80% for São Paulo state and 65% for other states in the Center-South region.

In this way, Copersucar urges that CARB include an option for self-declared mechanization percentage in the tier 1 CI calculator, so the calculator would have 2 options: to use a default mechanization value or input the site-specific values. Due the high mechanization percentage, we would prefer to prove that we have a highest level as this has a significant impact on the CI value.

These update consider the reality of sugarcane mechanization practices in Brazil.

Best regards,



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Sustentabilidade

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