

April 20, 2018

Energy Resources Center (MC 156)
1309 South Halsted
Chicago, Illinois 60607-7022
www.erc.uic.edu

Renée Lawver, PE,
Air Resources Supervisor
California Air Resources Board,
Low Carbon Fuels

Subject:

Dear Mr. Lawver:

Thank you for the opportunity to comment on the Verification Approach. As a former member of the CARB Land Use Change Expert Working Group I offer the following comments:

- The approach chosen by ARB will lead to tremendous additional costs for companies as verification / certification for different markets will require multiple audits.
- The amendment does not consider the existence of already well established certification schemes. The use of multi stakeholder certification schemes can be considered as best practice. Such schemes work efficient, have technical competencies, work globally, are not restricted by public sector constraints, and can re-act quickly to market changes.
- The approach chosen will increase complexity and risk of fraud, as independent verifications will take place without the option to assess supply and delivery in international supply chains and to different regulatory systems. This could result in double-claiming of certain feedstock characteristics and CI numbers.

Please do not hesitate to call me at (312) 316-3498 if you have any further questions.

Kind regards,



Steffen Mueller, PhD
Principal Economist