



Rolf Hogan, Executive Secretary
E-mail : rolf.hogan@rsb.org

Mr. Richard Palmer, President and CEO
Global Green Energy Holdings, Inc.
6033 W. Century Blvd Suite 895
Los Angeles, California 90045
United States

Geneva, 10 July 2014

**RE: Comments on the pending Method 2B Application, Sustainable Oils, Inc.,
Camelina sativa-based fuels pathway.**

Dear Mr. Palmer,

The Roundtable on Sustainable Biomaterials (RSB) would like to submit a letter in support of the pending Method 2B Application submitted by Sustainable Oils, Inc. for a Camelina sativa-based fuels pathway.

The unique characteristics of camelina, specifically its short growth period and low moisture requirements, suggest that camelina sativa can likely be grown within existing agricultural cropping rotations under certain circumstances. For example, camelina may be grown during fallow cropping rotations during dryland wheat farming, or through early emergence before spring seeding.

RSB promotes sustainability practices through its standard which include low-input crops that can be produced with minimal impact on existing food, forage and fiber crop production systems, and which drive innovation and efficiency in the agricultural sector.

Public policy should support innovation which drives more sustainable cropping systems which use less inputs, and with improved greenhouse gas profiles.

Sustainable Oils, Inc. is owned by GCE Holdings, which is an RSB member and has communicated its plans to undergo certification of its operations through the RSB sustainability certification program. RSB applauds the efforts of Sustainable Oils, Inc. to be on the leading edge of sustainability and to develop innovative cropping systems that promote sustainable bioenergy crop production.

Yours Faithfully,

A handwritten signature in blue ink, appearing to read 'Rolf Hogan', is written over a light blue circular stamp or watermark.

Rolf Hogan