



Dr. Cheryl Laskowski,
Chief, Transportation Fuels Branch
California Air Resources Board
1001 I Street
Sacramento, CA 95814

April 7, 2023

Subject: NARA Comments on Proposed Advanced Clean Fleets (ACF) Regulations

Dear Dr. Laskowski:

The North American Renderers Association (NARA) appreciates the opportunity to comment on the proposed Advanced Clean Fleets (ACF) regulations during the comment period ending today.

The primary comment that NARA has on the ACF regulations is that the proposal delays implementation of the ACF program for waste haulers as essential under California's SB 1383 program and does not delay implementation for renderers, which are equally essential to the SB 1383 program. We support delayed implementation for both parties as both are essential to the success of SB 1383.

In California, many cities rely on renderers to collect their organics in order to achieve SB 1383 reductions in landfill usage. If all renderable products were sent to US landfills, all available landfill space would be full within 4 years. CA Recycle has stated on their website that rendering qualifies as landfill diversion under SB 1383.¹

Each year, the rendering industry transports huge volumes of animal leftovers to plants in order to produce rendered fats and proteins which are recycled into new products such as animal feed and biofuels. Much of these materials entering and leaving rendering plants is moved by truck. Thus, NARA's members own and operate one of the largest volume truck fleets of any industry in California and North America.

According to the Environmental Protection Agency, food waste takes up more space in landfills than any other material. Finding ways to reuse leftover meat materials offers a powerful solution

¹ CalRecycle website located at: <https://calrecycle.ca.gov/organics/slcp/faq/swf/#misc>

for sustainable waste management. Renderers provide an essential service to save landfill space and help protect the environment as a whole.

Rendering is the greenest option for recycling organics. Rendering of animal byproducts sequesters at least five times as much greenhouse gas (GHG) emissions as it emits. Rendering has the same effect on GHG emissions as removing 12,263,316 cars from the road, while composting and landfiling actually emit GHG emissions into the environment.

Rendering also stops greenhouse gases from being released into the environment, which would occur if meat materials were allowed to decompose in a landfill. By diverting this material from landfills, renderers are upcycling it into new products like nutritious pet food, and biodiesel, and substantially reducing food waste.

In the January 4th, 2023 Department of Resources Recycling and Recovery (CalRecycle) Organic Diversion Implementation Update it states: “Not only has California not achieved the 2020 statutory target of 50% reduction in organic waste below the 2014 baseline, but we are now disposing at a rate nearly 1 million tons above the baseline.” Thus, the State is already experiencing barriers to achievement of the SB 1383 goals. Because of the current state of compliance with SB 1383, it is important that additional barriers not be imposed on the California rendering industry and the cities that rely on them for SB 1383 compliance.

We encourage CARB’s final ACF regulation to include all trucks essential to SB 1383 landfill diversion as eligible for the delayed implementation date.

NARA appreciates your consideration of these comments.

Sincerely,

A handwritten signature in black ink, reading "Kent Swisher". The signature is fluid and cursive, with the first name "Kent" and last name "Swisher" clearly distinguishable.

Kent Swisher
President and CEO, NARA