



November 5, 2020

Transportation Fuels Branch
Attn: Sam Wade, Branch Chief
California Air Resources Board
P.O. Box 2815
1101 I Street
Sacramento, CA 95814

RE: Comments on Low Carbon Fuel Standard Public Workshop to Discuss Potential Regulation Revisions

Dear Mr. Wade,

PreZero US is an organic and plastic waste recycling firm, headquartered in Los Angeles with processing facilities in Ontario and Jurupa Valley, CA as well as Westminster, SC. Along with our joint venture partner, AgriProtein, a world-leading insect technology company, we founded Bioko, whose mission is to use the power of nature to fully integrate U.S. food waste into the circular economy, with a vision of repairing the planet for future generations. We chose California due to the state's national and global leadership on waste diversion and recycling.

Bioko has already invested millions of dollars into Black Soldier Fly (BSF) technology to treat organic waste at our demonstration facility in Ontario, CA. Bioko is also planning on building a world's first, large scale food waste upcycling facility that will divert over 135,000 tons of food waste away from landfill each year. Bioko will invest over \$70m into the project, and while designed and engineered using proven technology, this facility will be the first of its kind built at this scale. This facility will demonstrate how insect technology can be used to recycle hundreds of thousands of tons of food waste a year, proving the technology as a viable, sustainable, and scalable, way to recycle food waste.

A large feature of our BSF operation is the generation of significant volumes of a valuable byproduct stream consisting of fat, oil, and grease (FOG). This FOG is separated from the organic waste feedstock during processing, and the facility is designed to remove approximately 5,000 tons per year. The FOG byproduct could be supplied as a feedstock to renewable liquid transportation fuel production facilities. This organic waste feed stream is obtained from source-separated pre-consumer organic waste. It is our understanding that this material would fall under the categorization of municipal solid waste food scraps as defined in the Tier 1 Simplified CI Calculator for Biomethane from Anaerobic Digestion of Organic Waste. As such, PreZero is seeking clarification from CARB on whether landfill diversion avoided methane credit can be

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factored into the lifecycle analysis for a potential Tier 2 joint pathway with a liquid transportation fuel producer? As the landfill diversion credit is solely dependent on the characterization of the organic waste feedstock and not the fuel, the same methane avoidance credit available to biomethane producers should be available to claim by other types of fuel producers as well.

PreZero US is committed to supporting California's sustainability goals through innovation and collaboration. We appreciate your consideration and response on this matter.

Sincerely,

Selene Lawrence

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