

November 5, 2020

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

**Re: Carbon Intensity for Canadian Canola Used as a Feedstock for Biofuels sold in California**

To Whom It May Concern:

This letter is in response to the California Air Resources Board's public workshop to discuss potential revisions to the Low Carbon Fuels Standard regulation held from October 14-15, 2020.

While the two-day workshop covered many potential revisions to the regulation, there was not a detailed discussion on CARB's GREET model and how it can be used to fully capture carbon intensity (CI) scores for biofuel feedstocks like canola. Life Cycle Assessment (LCA) models are fundamental to the efficacy of low carbon fuels standards and continuous improvement is essential to ensure biofuel's contributions to driving GHG reductions are properly reflected in the regulation.

In this regard, we would like to take the opportunity to request that CARB allow the GREET model to incorporate data regarding the sequestering of carbon in soil associated with growing canola in Western Canada. Soil Organic Carbon (SOC) is a major factor in reducing canola's overall carbon intensity but one that has not yet been recognized for use by CARB in the GREET model.

Soil carbon changes from land management practices such as minimal or zero till have been demonstrated to sequester and store significant amounts of carbon in the soil. According to the Government of Canada minimal and no-till farming help Canadian farmers sequester 8.8 million tonnes of greenhouse gases in their fields every year<sup>1</sup>.

It is important to note that CARB already recognizes soil organic carbon as a key element in its ILUC calculations. Rather than the release of sequestered carbon being accounted for under ILUC we are requesting that the sequestration of carbon also be accounted for in GREET.

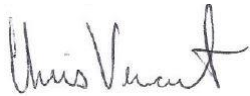
It is our understanding that CARB is open to establishing modified CI numbers where the case can be made for this and where a clear, fully auditable verification pathway can be shown to be in place. In the case of Canadian canola, a strong verification pathway exists today.

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<sup>1</sup> Environment and Climate Change Canada, National Inventory Report: 1990-2018, Greenhouse Gas Sources and Sinks in Canada, Part 1, (Ottawa: Environment and Climate Change Canada, 2020) at 158

We are preparing a detailed paper on the SOC issue that we will be forwarding to CARB as a basis for our request to have the GREET model use related SOC data. Once the paper has been submitted, we would welcome an opportunity to have a virtual meeting with CARB to discuss this issue in more detail.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Vervae". The signature is written in a cursive style with a large, stylized initial 'C'.

Chris Vervae  
(on behalf of the Canola Council of Canada and Canadian Oilseed Processors Association)