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Carolyn Lozo  
Chief, Transportation Fuels Branch  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

Via electronic submission

Re: Proposed Low Carbon Fuel Standard Amendments

Transportation Fuels Branch Chief Lozo:

We appreciate the opportunity to comment on the California Air Resources Board's (CARB) Proposed Low Carbon Fuel Standard Amendments issued on December 19, 2023.

Corteva Agriscience is a U.S.-based global company entirely focused on agriculture. Founded on nearly a century of breeding and scientific expertise, we develop innovative seed and crop protection products and services with the goal of helping farmers maximize productivity, drive profitability, and enhance sustainability, while also equipping them to provide consumers with a wider range of safe, healthy and nutritious food options. These products are also critical components to a resilient agricultural system that enables food and energy security.

In the process of its review of proposed amendments to the Low Carbon Fuel Standard, we encourage CARB to consider two key points:

- 1) **Recognize existing and proven certification programs for sustainable biofuels production, rather than creating additional traceability requirements, which could create undue regulatory burdens on individual farmers.** U.S. farmers successfully participate in a variety of existing programs validating the use of biofuel production methods that meet international commercial and regulatory standards. Programs include the U.S. Soybean Export Council's Soy Sustainability Assurance Protocol, the National Cotton Council's Cotton Trust Protocol, and the U.S Grains Council's Corn Sustainability Assurance Protocol, among others. The certifications provided by these programs are increasingly sought by international buyers who wish to ensure sustainably sourced, deforestation-free inputs for their food, fiber, and fuel needs.
- 2) **Similarly, as CARB works to refine land-use and environmental models for biomass-based feedstock, ensure the use of the most up-to-date datasets that reflect the latest sustainable farming practices.** Farmers have made significant gains in yield and productivity over the years, resulting in consistently higher yields on the same or fewer acres, with less carbon intensive inputs. This progress should be reflected in current modeling.

We are committed to working side-by-side with farmers in the U.S. and around the world to deliver expertise and innovative products that support more sustainable and productive farming, whether the crops are used for feed, food, fiber, or fuel. We support farmers with training and tools to help them incorporate the latest advances and technology into their daily operations. Around the world and across all product portfolios, our experienced Corteva agronomy, product, sales, and R&D team members provide a variety of educational opportunities to farmers both in person and online. With a deep commitment to transparency, these efforts focus on sharing the latest information, technologies, best practices and product innovations to help farmers find ways to improve soil health, nutrient and water stewardship, and productivity that are right for their unique, local needs.

An example of a way we're providing the latest sustainable innovations to farmers is our proprietary winter canola seed adapted for the Southern U.S. environment. Together, with Bunge and Chevron Renewable Energy Group, we are working to develop the necessary seed and processing supply chain to support the production of renewable diesel and sustainable aviation fuel. The resulting fuel is compatible with existing combustion engines and will provide a more sustainable option for aviation and diesel fleets. Importantly, it will also support farmers as they work to address some of the world's most pressing challenges, including the energy transition, climate change and food security. Farmers can increase their income potential while prioritizing the sustainability of their operation by reducing greenhouse gas emissions and ensuring land coverage year-round.

Once again, we appreciate the opportunity to comment on the Proposed Low Carbon Fuel Standard Amendments and look forward to supporting your efforts to implement an effective LCFS program.

Sincerely,

Kendall Palmer  
Senior Director and Growth Leader, Biofuels  
Corteva Agriscience