

October 11, 2024

Steven S. Cliff, Ph.D.
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments on Second Proposed 15-Day Changes to Proposed LCFS Regulation

Dear Dr. Cliff:


We are writing to provide comments on the proposed 15-day change document that was published on October 1, 2024.

Darling Ingredients is North America's largest purveyor of waste fats and oils and is a 50% owner of the nation's largest renewable diesel production facility through a joint venture. Most of the fats that Darling Ingredients processes from its North American factories (used cooking oil and animal fat) are used as feedstocks for domestically produced renewable diesel. We have collection, recycling, and processing operations at several locations in California¹. According to CARB, our renewable diesel reduces greenhouse gasses (GHGs) by as much as 80%, particulate matter by 30%, and NOx by 10%. Renewable diesel is compatible up to 100% in all existing vehicles, equipment, and infrastructure. Following substantial investment, one of our joint venture's renewable diesel plants will be converted to produce approximately 235 million gallons of sustainable aviation fuel (SAF) beginning later this year.

With the Administrative Procedure Act (APA) deadline fast approaching, we strongly urge the board to approve the proposal without further delay on November 8th. Prompt finalization is necessary to sustain the state's momentum on decarbonization efforts. The ambitious 2025-2029 carbon intensity (CI) benchmarks, particularly the 9% reduction in 2025, along with the Automatic Acceleration Mechanism (AAM) are vital to restoring balance to the credit market and ensuring the program meets its GHG and co-pollutant reduction goals. If non-consensus issues persist after nearly three years of formal and informal rulemaking, we recommend addressing those in a future regulatory process.

Once again, thank you for considering our comments. If you should have any questions, please feel free to contact me at any time at shelby.neal@darlingii.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Shelby Neal".

Shelby Neal
VP - Renewables & Energy Policy

¹ Fresno, Los Angeles, San Diego, San Francisco, Santa Ana, and Turlock.