



November 6, 2024

The Honorable Liane M. Randolph, Chair
California Air Resources Board

Comment Submitted Electronically

RE: Bayer Crop Science's Low Carbon Fuel Standard Comments to the Governing Board-
Request that Board Resolution Unlock Benefits of Climate Smart Agriculture

Dear Chair Randolph:

Bayer Crop Science (Bayer) appreciates the current and historic efforts by the California Air Resources Board (CARB) to reduce the greenhouse gas (GHG) emissions from transportation through the implementation of the State's Low Carbon Fuels Standard (LCFS). Bayer supports the continued evolution of the LCFS through the CARB rulemaking process. Of particular interest to Bayer is the production of biofuels in the most sustainable manner including increasing GHG reductions through the cropping systems which enable and are designed for climate smart agriculture.

Sustainability and the Recognition of CSA:

Bayer commends California Air Resource Board's efforts to ensure sustainability practices and reduce land use change. Bayer recommends that to most effectively achieve California's goals, it will be critical for CARB to work with stakeholders as CARB interprets, implements, provides further guidance, and phases in the sustainability and certification requirements.

American growers have a broad range of climate-smart opportunities that reflect regional variation, crop selection and physical landscape characteristics. A 2024 literature review in "Mitigation and Adaptation Strategies for Global Change" recommends, "Policymakers should prioritize flexibility in policy frameworks, allowing for adaptation to the distinct characteristics of various agricultural landscapes. This flexibility will enable the effective customization of CSA practices, ensuring their alignment with the specific challenges and opportunities faced by farmers in diverse regions."¹

In order to inform the integration of CSA into the LCFS, we recommend that the Governing Board add a parallel provision to the Board Resolution that states the following:

Be it further resolved that the Board directs the Executive Officer to convene a public forum in the next 12 months on the latest science on climate smart agriculture practices related to feedstocks used to produce transportation fuels and the impact of climate smart agriculture on greenhouse gas emissions for consideration in a future LCFS update. This should include a public discussion and consider viewpoints from industry, environmental advocacy groups, academia, and government agencies such as the California Department of Food and Agriculture and the United States Department of Agriculture.

¹ *Id* at 22.



About Bayer Crop Science

Bayer is a global enterprise with core competencies in the life science fields of health care and crop science. Bayer's products and services are designed to help people and the planet thrive by supporting efforts to master the major challenges presented by a growing and aging global population. We are deeply committed to reducing emissions aggressively across our own enterprise and enabling our customers to reduce emissions throughout the agriculture sector. Bayer is pioneering farming solutions that accelerate the decarbonization of the food, fuel and agricultural supply chain and is supportive of policy development that recognizes the potential of climate-smart agriculture as an effective lever for achieving these goals.

Conclusion

CARB is a respected international leader in developing and implementing programs to reduce GHG emissions across the California economy. The inclusion of CSA practices in the LCFS will expand the State's leadership throughout the country, especially in the Midwest where a large portion of the feedstocks for LCFS fuels are grown.

Bayer appreciates the opportunity to share its perspective and expertise to raise awareness of the science and innovation enabling our customers to grow crops that contribute significantly to clean transportation fuel programs and advance the climate change goals of both California, and the United States. We thank CARB for this opportunity to offer these comments and look forward to continued collaboration to implement policies and strategies that further reduce emissions from the transportation sector.

Sincerely,

A handwritten signature in black ink that reads "Chelsey Robinson".

Chelsey Robinson
Director, North America Sustainability; Agriculture Affairs
Bayer Crop Science