



November 6, 2024

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

RE: Raízen's Low Carbon Fuel Standard Comments to the Governing Board

Dear Chair Randolph:

Raízen 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). Raízen supports the continued evolution of the LCFS through the CARB rulemaking process. We deeply appreciate CARB's dedication to the Low Carbon Fuel Standard and commend the Board's continuous leadership in shaping policies that advance the adoption of cleaner, sustainable fuels. This program sets a global standard, and we are grateful for the opportunity to contribute.

Raízen supports CARB's proposed changes, particularly the emphasis on advanced biofuels and clear guidance on sustainability certifications. Our sugarcane operations are certified by internationally recognized schemes, and we are well positioned to meet CARB's rigorous standards. We encourage CARB to align its regulations with global standards to encourage the inclusion of sustainable feedstocks from around the world.

During the course of this rulemaking, there has been significant public discussion about the greenhouse gas (GHG) reduction benefits of climate-smart agriculture and the issue of indirect land use change (ILUC). Raízen submitted a detailed comment¹ recommending that CARB recognize and integrate the benefits of climate smart agriculture into the LCFS program. Regarding ILUC, we urged CARB to be open to the possibility of lowering scores when the evidence supports it, not just increasing them in ways that disadvantage non-U.S. feedstocks.

To inform CARB's approach toward climate-smart agriculture and the assessment of ILUC, we would recommend that CARB dedicate resources to engaging in the international dialogue on these issues. For example, the International Energy Agency very recently released an analysis entitled Carbon Accounting for Sustainable Biofuels that merits CARB review and consideration.² We also recommend the inclusion of the following paragraph into the Board Resolution:

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

¹ <https://www.arb.ca.gov/lists/com-attach/7305-lcfs2024-AXMAZwRsWHELaAhm.pdf>

² International Energy Agency, "Carbon Accounting for Sustainable Biofuels," July 2024, available at <https://www.iea.org/reports/carbon-accounting-for-sustainable-biofuels>.



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.

Due to the substantial importance of climate smart agriculture and ILUC, we would recommend that the Governing Board resolution that approves the LCFS revisions also direct CARB staff to study these practices over the next 18 months and report back to the Governing Board in July of 2026 with findings and recommendations. Since the LCFS is a technology-neutral, science-based program, it is our position that if non-U.S. fuels demonstrate lower land use change impacts, these fuels should be recognized and incentivized with more favorable carbon intensity scores.

Raízen is committed to working with CARB to ensure the successful implementation of these regulations. Our E2G technology, which transforms sugarcane waste into ethanol, and our contributions to sustainable aviation fuel, are just a few examples of how we are positioned to provide cutting-edge low carbon and sustainable biofuels to help California meet its ambitious goal of carbon neutrality by 2045. We look forward to continued collaboration in advancing a global low-carbon future."

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Jim VandePutte". The signature is written in a cursive, flowing style.

James Vandeputte
Head of Policy and Advocacy, North America