

IETA Comments on CARB's Third 15-Day Proposed Changes to the LCFS Regulation

21 April 2025

The [International Emissions Trading Association \(IETA\)](#) appreciates the opportunity to comment on the California Air Resources Board's (CARB) recently released [Third Notice of Public Availability of Modified Text and Availability of Additional Documents and Information](#) for the Low Carbon Fuel Standard (LCFS).

IETA believes the LCFS is a key strategy in California's suite of greenhouse gas (GHG) focused reduction measures and supports its approval by the Office of Administrative Law (OAL). Since the LCFS program's implementation in 2011, California's LCFS has proven to be a successful market-based policy that drives investments in lower-carbon emission fuels while delivering millions of tonnes of GHG reductions. The LCFS, reflecting the proposed amendments, is a model for effective policy building on the program's history of success to reduce emissions because it: 1) sets clear, science-based targets; 2) establishes clear regulations for program implementation; and 3) provides the market with clear and consistent signals that support innovation and drive down costs.

The OAL's recent administrative disapproval of certain proposed amendments to strengthen the program has unfortunately delayed implementation of critical program amendments. IETA would like to underscore the importance of concluding the LCFS rulemaking as soon as possible. Further delay diminishes the necessary signal the market needs to facilitate and encourage continued investments in clean fuels. IETA strongly encourages CARB to swiftly address the concerns laid out in the disapproval, consider stakeholder feedback, resubmit the package to OAL, and ultimately begin prompt implementation of the new amendments.

Thank you to the staff for their hard work and for this opportunity to comment.