

April 21, 2025

The Honorable Liane Randolph
Chair, California Air Resources Board

Dr. Steven Cliff
Executive Officer, California Air Resources Board

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Third 15-Day Changes

Dear Chair Randolph and Executive Officer Cliff,

The country of Brazil is the largest beef exporter in the world, exporting more than twice as much as the US. Minerva Foods, the second largest beef exporter in Brazil and one of the world's 10 largest, operates slaughtering and rendering facilities in various states of the country. Our company, Minerva Biodiesel, is the biodiesel production subsidiary of Minerva Foods.

Minerva Biodiesel was created to turn what would otherwise be waste tallow resulting from the slaughtering and rendering operations into a productive use to combat climate change. The company, which commenced operations in 2011, was the first Brazilian company to produce biodiesel exclusively from tallow.

We appreciate the opportunity to provide our comment on the Third 15-Day Changes in connection with the proposed LCFS amendment, as follows:

The California Office of Administrative Law (OAL)'s February disapproval of the LCFS amendment as adopted by the CARB Board and CARB's subsequent submittal of the Third 15-Day Changes to address the disapproval raise questions about the effective date of the amendment, should OAL approve the revisions.

CARB submitted the Third 15-Day Changes on April 4, 2025. If OAL approves the amendment with the 15-Day Changes with 30 working days, as required, i.e., by no later than May 16, 2025, that would leave sufficient time for the final regulation to be filed by May 31, 2025. According to the OAL website, a final regulation filed by May 31st would "generally ...become effective on ... July 1." The OAL site goes on to say that "effective dates may vary, however, ... if the adopting agency requests a later effective date, or if the agency demonstrates good cause for an earlier effective date."

We write this comment letter as a stakeholder in the amendment process. We request that the amendment become effective on the date specified according to the general rule on the OAL website, i.e., July 1, 2025. Doing so will eliminate confusion among stakeholders.

Sincerely,

Marcelo Alcantara Queiroz
Director, Minerva Biodiesel



MINERVA S.A.