



BRAZILIAN SUGARCANE INDUSTRY ASSOCIATION

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Dear Mr. Prabhu,

UNICA would like to share a few comments regarding the preliminary draft of potential regulatory amendments to LCFS text and ask you to consider them before moving forward. We look forward to reviewing the updated version of the CI calculator and continuing our conversations with CARB.

Best regards,

Leticia

Leticia Phillips

Representative – North America

Brazilian Sugarcane Industry Association - UNICA

1. Foreign companies are already registered with the AFP system and do not have a FEIN (Federal Employer Identification Number). Will CARB propose another ID number for foreign companies?
2. On Page 116 “enforcement action” : It is still unclear to us what the penalty is in case of an increase in CI. Is this still to be determined? We just want to make sure we have not missed it in the text.
3. Accreditation of verifiers and auditing companies conflict of interest: We urge CARB to work with current auditing firms in Brazil to understand the realities of the market. We are afraid that restrictions in the draft regulation will not allow Brazilian mills to be in compliance since it will make the pool of auditors/verifiers extremely restricted in the Brazilian market.
4. Item § 95488.9. (a), page 115, the March 31st deadline poses a challenge for Mills in Brazil, since this is when mills end its operations and some documents may still need to be prepared past this date in order to be reported to CARB. Ideally mills would have a month post the end of its harvest period to get all documents ready to sent to CARB.
5. If we may suggest, CARB should spell out and describe in detail the different inputs in the calculator so there is no margin for interpretation error and non-compliance.