



February 2, 2026

Air Resources Board  
1001 I Street  
Sacramento, CA 95812

**Response to Comment from Simona Vanecek**

Crimson appreciates the interest of all parties participating in the public comment process and the opportunity to respond to comments.

As per § 95488.7 (d)(5)(A), “Only comments related to potential factual or methodological errors will require responses from the fuel pathway applicant.” The comment regarding animal welfare and ethical sourcing standards falls outside the scope of pathway-specific factual or methodological review and is best addressable by CARB staff.

“Traceability of supply chains” is already required by § 95491.1 and other parts of the LCFS regulation:

*Evidence demonstrating chain of custody from the point of origin along the supply chain to the fuel production facility is required for any feedstock defined as a specified source feedstock pursuant to section 95488.8(g).*

Crimson adheres to this requirement already as part of its ongoing participation in the LCFS.

Regarding, “Environmental impacts of rendering operations, which can vary widely depending on energy use and waste handling.” The Tier 1 Simplified CI Calculator for Biodiesel and Renewable Diesel used for this application includes modeling of animal fat processing operations.

Finally, “Availability of alternative waste-based feed stocks (e.g., used cooking oil) that may offer similar or lower carbon intensity without the same ethical concerns.” This pathway application includes pathways for these other feedstocks suggested, such as used cooking oil.

Thank you for your comment.