* My name is Scott Hedderich, and I work for Nuseed, a global agriculture company enabling the transformation of select crops, like carinata, into renewable and traceable sources of lower-carbon energy.

I have 2 points and a question

* First point. On sustainability, Slide 58 lists guard rails and strategies. We would ask CARB to look at adding as a listed strategy a move utilize innovative intermediate cover crops like Carinata - which is a crop not intended for food use and is grown on winter fallow ground. By reference, Europe has been a leader in this area as their recent proposed changes to their annex IX (9) demonstrate - obviously we would like to see California follow a similar path
* Slides 61 and 62 - CARB could be implying that feedstock suppliers would be working with directly with CARB on sustainability certification. Currently, biorefiners seeking pathways work directly with CARB and involve the feedstock suppliers in the process when and where appropriate and that would include auditing and 3rd party verification. At the end of the day, though, the pathway lies with the refiner and they “own” that process.
  + **Question 1**: Moving forward, are we looking at two parallel processes here or something else that is nested within the pathway process itself?
  + **Second point** slide 61 states “Feedstock providers interested in participating in the LCFS will select a CARB approved certification system.” Section § 95502 lays out qualifications and on page 276 of the proposal it states verifier(s) must have experience similar to RSB or ISCC or Bronsucro”.

So, I am assuming staff is going to develop a list of approved certifiers, similar to the approved auditors and 3rd party verifiers. If so based on past experience, Nuseed would ask that the process developing that list moves as *quickly* as possible. Also, depending on how staff move forward, I want to point out there could be a potential issue here in that work with these certification bodies doesn’t envision a rotation component the way work with auditors do.

We’ve been working with RSB for a number of years and would happy to share our learnings with you.

* Lastly, this is a tremendous amount of work, and you all should be proud of your efforts.

We looking forward to working with staff as they continue to develop the details around the sustainability provisions