

17 June 2021

California Air Resources Board
1001 I Street
Sacramento, California 95814

Re: Comments to Application No. B0179 - Crown Iron Works

Neste creates sustainable solutions for combating climate change and accelerating a shift to a circular economy. Each year, the company brings approximately 300 million gallons of renewable products into North America, with most ending up in California. This volume is expected to increase as our production capacity grows. In collaboration with local businesses, Neste safely supplies this renewable, low carbon fuel to thousands of California cities and businesses, helping them achieve their climate goals faster. We do this via an ever expanding distribution network that currently includes more than 1,400 fueling sites across the state. Neste has consistently been included in the Dow Jones Sustainability Indices and the Global 100 list of the world's most sustainable companies.

Neste has created a fully traceable supply chain. We account for every new GHG emission from the production and distribution of our renewable fuels and transparently share this data with regulators. The company has worked closely with CARB staff and CARB approved verifiers to ensure that the information submitted for the LCFS pathway application met all requirements for the LCFS program. Pathway applications take into account the impacts of the greenhouse gas associated with transportation of raw materials and finished products. The transportation methods which are allowed in the CA-GREET 3.0 calculator include transportation by truck, barge, rail, and by ocean tanker.

The carbon intensity of the complete supply chain described in Neste's application - including transportation emissions - has been duly calculated, reviewed, and verified. Changes to the greenhouse gas modeling to assess extra "penalties" for transportation above an arbitrary distance is not scientifically defensible, outside the scope of the regulations, and has not been previously applied to approved pathways of other applicants.

Neste is proud of the important role we play in helping California cities and businesses reduce GHG emissions and pollution, with more than 1.5 billion gallons of renewable diesel supplied to the state to date. We look forward to continue growing our presence and making it even easier for California cities and businesses to access low carbon, renewable fuels.

Neste US, Inc.

3040 Post Oak Blvd, Suite 1700
Houston, Texas 77054 USA

