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California LCFS – B0521 Fuel Pathway Application
Response to Comments
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Anil Prabhu
California Air Resources Board (CARB)
Low Carbon Fuel Standard (LCFS)
1001 I Street
Sacramento, California

Submitted Electronically

**RE: Response to Comments on LCFS Fuel Pathway Application B0521 from Pam Brigg
McKown**

Phillips 66 Company (Phillips 66) appreciates the opportunity to provide a response to public comments on LCFS fuel pathway application B0521 for renewable gasoline from Argentinian soybean oil.

The price of soybean and soybean oil is impacted by many factors and not just biofuel production. Any increase in soybean oil prices due to increased biofuel demand has been captured in the GTAP analysis and is reflected in the LUC score of 29.1 g/MJ.

As discussed in Attachment B of the fuel pathway application, there's no significant net expansion in herbaceous crop area in Argentina from 2005 to 2020; there was an annual increase of 0.15% from 2005 to 2012, followed by a decrease at a rate of 0.13% annually from 2012 to 2020.¹ This change accounts for all herbaceous crops not just soybean.

Finally, Argentina double cropping practice enables more crop production on a given acreage, whether the crops are used for human food consumption, animal feed or biofuel fuel production. This practice benefits not only biofuel feedstock production but also food for human consumption and animal feed. Furthermore, soybean oil for food consumption represents a relatively small percentage in Argentina. According to USDA statistics, soybean oil supply in Argentina has been largely exported or consumed domestically for biofuel production, while soybean oil for domestic food consumption only represents ~6% of total production from 2005 to 2020.²

In conclusion, Phillips 66 requests that the proposed fuel pathway be certified.

Sincerely,

Marc Ventura

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¹ Food and Agriculture Organization (FAO) of the United Nations. Land Cover Statistics. CCI-LC dataset. Spatial resolution 300 m. [https://www.fao.org/faostat/en/?&data.\)#data/LC](https://www.fao.org/faostat/en/?&data.)#data/LC)

² United States Department of Agriculture (USDA) Foreign Agriculture Service (FAS), Production, Supply and Distribution (PSD) datasets. <https://apps.fas.usda.gov/psdonline/app/index.html#/app/downloads>