



Braya Renewable Fuels  
2950 N. Harwood St., Ste. 1550  
Dallas, Texas 75201

March 26, 2025

Anil Baral  
California Air Resources Board (CARB)  
Low Carbon Fuel Standard (LCFS)  
1001 I Street  
Sacramento, California

*Submitted Electronically*

**RE: Response to Comment submitted by Mr. Rich Field concerning Application No. B0703 – Braya Renewable Fuels (Newfoundland) LP (C1221); Canada**

Braya Renewable Fuels (Newfoundland) LP (“Braya”) values the opportunity to provide more insight and direction on the topics raised in the public comment submitted to the fuel pathway application number B0703 concerning Argentina soybean oil emissions and potential impacts of the resulting renewable diesel produced by Braya.

Renewable diesel is a 100% drop-in substitute displacing fossil diesel, unlike “bio diesel” referenced in the comment, which can only be blended at a rate of 5% to 20%, thereby meeting requirements set forth under a Low Carbon Fuel Standard, as well as having a positive impact on the “Global Climate Change” issue referenced within the posted comment.

On the first point concerning emissions from transportation to and from Newfoundland, as discussed in the LCA Report under Section 2 for the soybean oil from Argentina, and under Section 5 concerning renewable diesel shipped to California, Braya is located on the island of Newfoundland and Labrador, and the only transportation upstream of feedstock production is by very large trans-oceanic vessels. The larger vessel sizes used result in GHG emissions savings due to economies of scale, requiring fewer physical units and transfers. The exact numbers have been redacted due to the confidential nature of the data.

Regarding emissions in Argentina, including those due to inland transportation, resulting from the cultivation of soybeans, and from processing beans into oil, Section 3.1 of the LCA Report goes into a considerable amount of detail from farm to crushing. Argentina soybean oil production has been well-established for decades and utilizes superior climate-smart agricultural practices, including double cropping, cultivation without irrigation at a rate of almost 98%, and no-till technology at a rate of 92% adoption on neutral soils, eliminating the need for soil pH adjustments. As for transportation, farms producing beans for extraction and export are largely concentrated in areas convenient to the crushing facilities and accessible by truck, train, and barge. The crushing facilities producing the oil are located on or very near the port of export, with the majority transporting via pipeline with negligible emissions.

Though Argentina soybean farming, transportation, and extraction emissions are shown to be lower than those of the U.S., Braya has chosen to use the U.S. soybean oil emission values as a conservative measure as described in the LCA Report.

Further, Braya has opted to treat Argentine soybean oil as a specified-source feedstock, documenting the soybean oil receipts all the way down to the farm-level.

Braya respectfully requests that the pathways under Application B0703 be certified.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jennifer M. LeRow", with a stylized, flowing script.

Jennifer M. LeRow  
Director of Regulatory Compliance  
Braya Renewable Fuels (Newfoundland) LP