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July 31, 2024

Bill Peters  
Oregon Department of Environmental Quality  
700 NE Multnomah St., Suite 600  
Portland, OR 97232

Via electronic submission

**Re: Department of Environmental Quality Draft Oregon GREET 4.0 Calculator**

Mr. Peters:

Thank you for the opportunity to comment in response to the Oregon Department of Environmental Quality's (DEQ) Oregon GREET 4.0 (OR-GREET) Memo and Draft Calculator as part of the 2024 Clean Fuels Program (CFP) Rulemaking. The National Oilseed Processors Association ("NOPA") appreciates being able to share our observations. NOPA members have a vital interest in these issues.

Organized in 1930, NOPA represents the U.S. soybean, canola, flaxseed, safflower seed, and sunflower seed-crushing industries. NOPA's membership includes 16 members that are engaged in the processing of oilseeds for meal and oil that are utilized in the manufacturing of food, feed, renewable fuels, and industrial products. NOPA member companies operate a total of five softseed and 62 solvent extraction plants across 21 states. NOPA members crush approximately 95% of all soybeans processed in the U.S.

NOPA supports Oregon's CFP which drives demand for biodiesel, renewable diesel and sustainable aviation fuel (SAF), and encourages investment in low carbon feedstocks and value-added agricultural opportunities. We also appreciate the work that the Oregon DEQ is doing to update OR-GREET.

As the DEQ considers updating OR-GREET 3.0 to OR-GREET 4.0, it should take the opportunity to address the inconsistent application of the GREET Carbon Calculator for Land Use Change from Biofuel Production (CCLUB) when assessing indirect land use change (iLUC) values for different biofuel feedstocks under the CFP.

Current practice under the CFP assigns corn-based ethanol an iLUC value based on the CCLUB model, but not other feedstock pathways, including soy-based biodiesel, which are estimated using the GTAP and AEZ models. CCLUB was developed by Argonne National Labs as part of the GREET model, the base model under the CFP, is updated regularly, and generates a range of iLUC values for multiple feedstock pathways including soy-based biodiesel. Consequently, NOPA urges the DEQ to take this regulatory opportunity to uniformly apply the use of the CCLUB model for all feedstocks under OR-GREET, including soy-based biodiesel.

NOPA is eager to continue working with DEQ to support the role of agriculture in diversifying the fuel supply through more sustainable feedstocks and thereby supporting cleaner fuel options in Oregon and

beyond. On behalf of America's soybean processors, we appreciate this opportunity to comment, and look forward to collaborating with DEQ and other relevant stakeholders to enact policies that will address climate change while expanding the use of soy-based biofuels and market opportunities for soybean farmers.

Sincerely,

*Kailee Tkacz Buller*

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President & CEO  
NOPA