



1310 L Street NW Suite 375 • Washington DC 20005  
phone 202.864-4365 • fax 202.842.9126  
nopa@nopa.org • www.nopa.org

December 13, 2024

Adam Saul  
Clean Fuels Program  
Washington State Department of Ecology  
300 Desmond Drive SE  
Lacey, WA 98503

Via electronic submission

**Re: November Updated Changes to the Clean Fuels Program Rulemaking (Chapter 173-424 WAC)**

Mr. Saul:

Thank you for the opportunity to comment in response to the updated changes to the Washington Clean Fuels Program (CFS) Rulemaking (Chapter 173-424 WAC) issued on November 26th. The National Oilseed Processors Association (“NOPA”) appreciates being able to share our continued observations on this rulemaking.

Organized in 1930, the National Oilseed Processors Association (NOPA) represents the U.S. soybean, canola, flaxseed, safflower seed, and sunflower seed-crushing industries. NOPA’s membership includes 18 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 over 70 softseed and soybean solvent extraction plants across 21 states. NOPA members crush over 97% of all soybeans processed in the U.S. which equates to over 2 billion bushels annually.

In NOPA’s previous comments, we encouraged Ecology to include additional measures to address the legitimacy of imported feedstock, and we appreciate Ecology’s acknowledgement and inclusion of such measures in the November updates. Specifically, we support the new attestation letter requirements for specified source feedstocks, which aligns with recent updates in California and Oregon.

NOPA continues to look forward to working with Ecology to support the role of agriculture in diversifying the fuel supply through more sustainable feedstocks and thereby supporting cleaner fuel options in Washington and beyond. On behalf of America’s soybean processors, we appreciate this opportunity to comment, and look forward to collaborating with Ecology 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*

Kailee Tkacz Buller  
President & CEO  
NOPA