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November 21st, 2025

Secretary Karen Ross
California Department of Food and Agriculture
Climate Resilience Strategy Public Comment
1220 N Street
Sacramento, CA 95814
Email: cdfa.climate@cdfa.ca.gov

Subject: Advancing California's Climate Resilience Through Oilseed Based Biofuels

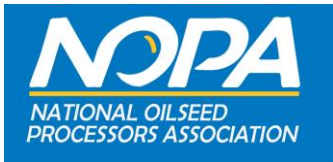
Dear Secretary Ross and Members of the CDFA Climate Team,

On behalf of the National Oilseed Processors Association (NOPA), thank you for the opportunity to comment on the Draft Climate Resilience Strategy for California Agriculture. NOPA commends CDFA for its forward-thinking approach to ensuring the sustainability and resilience of California's agricultural sector in the face of climate change.

As CDFA finalizes this important strategy, NOPA urges the Department to explicitly recognize the critical role of oilseed-based biofuels—particularly those derived from soy and canola—in advancing decarbonization, strengthening rural economies, and enhancing agricultural resilience.

Founded in 1930, NOPA represents the U.S. soybean, canola, flaxseed, safflower, and sunflower seed processing industries. Our 20 member companies operate 71 oilseed processing facilities across 20 states and collectively process over 98% of all soybeans in the United States. The oils and meals produced by our members are critical to food, feed, renewable fuels, and various industrial uses.

California leads the nation in the use of biomass-based diesel (BBD), showcasing how agricultural innovation can drive meaningful climate progress. Biofuels derived from soy and canola—such as renewable diesel and biodiesel—reduce greenhouse gas emissions by up to 72% compared to petroleum diesel, improve air quality, and enhance energy security while remaining cost-effective. As



affordability and both household and farm incomes remain strained, renewable fuels remain an important tool to manage fuel costs to the consumer.

The CDFA Strategic Plan 2025–2030 acknowledges the Department’s role in supporting biofuels and renewable energy innovations. Soy and canola-based biofuels are already available, scalable, and integrated into California’s existing infrastructure, offering immediate benefits for emissions reduction, farmer profitability, and consumer fuel costs.

A National Partnership for a Resilient Bioeconomy

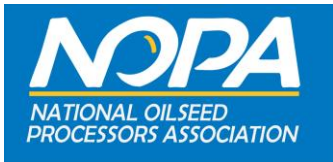
California’s success in clean fuel adoption is made possible through strong partnerships with oilseed producers across the U.S. These collaborations exemplify a resilient, farmer-led bioeconomy that connects national agricultural productivity—including soy and canola—with California’s climate goals.

Expanding Opportunities for Rural and Agricultural Communities

- Expanding in-state markets for oilseed-based biofuels will deliver significant benefits, including:
- Market Growth: Increased demand for renewable fuels creates stable, high-value opportunities for farmers growing soybeans and canola.
- Cost Savings: Renewable fuels offer affordable options for both the urban and rural economy.
- Economic Resilience: Infrastructure development supports local jobs and agricultural logistics.
- Climate-Smart Farming: Biofuels reduce the carbon footprint of agricultural operations.

Recommendations for the Climate Resilience Strategy

- Explicitly include soy and canola based renewable diesel and biodiesel as tools for agricultural decarbonization and energy resilience.
- Highlight California’s position as the top user of biomass-based diesel and the associated climate benefits.
- Strengthen language around partnerships with out-of-state producers to reflect the national agricultural network supporting oilseed biofuels.
- Develop targeted incentives to expand biofuel use in agriculture and transportation, including on-farm equipment and rural infrastructure.



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- Promote strategies to grow in-state markets for renewable fuels, ensuring affordable and resilient options for rural communities.
- Integrate biofuels into the broader bioeconomy framework, emphasizing their role in circular, low-carbon systems.

Conclusion

Oilseed-based biofuels, especially those derived from soy and canola, offer a proven, scalable solution for climate resilience, economic growth, and agricultural sustainability. By incorporating these fuels into the final Climate Resilience Strategy, CDFA can reinforce California's leadership in renewable energy and support a future where climate progress and rural prosperity go hand in hand.

We appreciate the Department's openness to stakeholder input and look forward to continued collaboration in advancing environmental goals while promoting domestic biofuels and supporting farmers and processors.

Sincerely,

Devin Mogler

Devin Mogler
President & CEO
National Oilseed Processors Association (NOPA)