

LCFS Verification services

Keeping **you** ahead of the game, by keeping **you** in-the-know

Low Carbon Fuel Standard (LCFS) Implementation Series #5

As we await the release of the proposed LCFS amendments which will extend the program to 2030 and add a verification requirement, we are continuing to review the more concrete areas of the expected regulation.

This is the fifth in a series of updates that Christianson will be providing on the current status of the regulation. If you missed the previous newsletters, you can find them on our [website here](#).

While CARB has been willing to draw some connections between the RFS and the LCFS verification procedures, there are still pieces that vary widely from RFS practices. One example of this is the tracking and reporting of correctable errors.

RFS Practices

As we complete attest procedures under the RFS we are typically in contact with you throughout that process to identify potential findings/errors that would be reported to the EPA. As we discover these errors, we typically identify things that can be corrected and suggest you take the necessary steps to correct as many errors as possible. Once documentation has been provided to prove corrections were made we normally remove findings from the attest report. Therefore, corrections made during the attest process prevent errors from ever being reported to the EPA.

LCFS Practices

The documentation and discussions provided by CARB indicates that correctable errors found during the verification process will be **required** to be corrected before finalizing the verification report. In addition, CARB will require the verification body (auditor) to maintain a corrections log. The corrections log will track all errors that have been identified during the verification and steps taken to correct noted errors. The final verification report submitted to CARB will be required to include the corrections log, therefore CARB will have notice of any errors that are discovered by the verification body.

This is one fundamental difference between the practices we have become accustomed to under the RFS and the new LCFS verification protocols. Stay tuned over the next year as we continue to explore the new proposed regulation, anticipated verification procedures and implementation guidance. If you have any immediate questions or other compliance needs please respond to this email or call [Kari Buttenhoff](#) at 320-235-5937. Keep an eye out for our next email in the LCFS Implementation Series!

[Call or Contact Us](#) today with any questions.

Contact Us

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