February 9, 2026

RE: Proposed California Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulation

The Corn Refiners Association (CRA) appreciates this opportunity to provide input to the California Air Resources Board (CARB) draft regulatory text implementing SB 253 (the Climate Corporate Data Accountability Act) and SB 261 (the Climate-Related Financial Risk Act), released on December 9, 2025.

CRA is the national trade association representing 100% of the corn refining industry in the United States. America's corn refiners manufacture hundreds of products with thousands of uses, including sweeteners, starches, advanced bioproducts, corn oil, and feed products, from dent corn components such as starch, oil, protein, and fiber.

CRA writes to highlight concerns that the proposed regulatory text could duplicate existing reporting frameworks and impose significant compliance burdens and costs that would be better directed toward meaningful, on-the-ground sustainability and decarbonization initiatives.

Duplicative Requirements

The proposed regulatory structure would create overlapping and duplicative reporting obligations with existing federal and voluntary frameworks. Rather than improving the quality or usefulness of climate information, the draft regulations would establish parallel processes with different methodologies, timelines, and verification expectations, without clear mechanisms for coordination or harmonization. This approach increases administrative burden and compliance complexity without demonstrating meaningful benefits for regulators, investors, or the public.

For example, many companies already report greenhouse gas emissions under EPA's Greenhouse Gas Reporting Program and provide climate and risk disclosures through widely used voluntary frameworks, including the Greenhouse Gas Protocol, Carbon Disclosure Project, and reporting aligned with the Task Force on Climate-related Financial Disclosures or International Sustainability Standards Board standards. In addition, several other states have introduced climate disclosure legislation that, if enacted, could further compound compliance obligations over time by creating a patchwork of state-specific requirements.

CRA is concerned that layering a new reporting program on top of existing frameworks is unnecessary to achieve the intended transparency objectives. If CARB elects to move forward with additional reporting requirements, CRA encourages the agency to align the final regulatory text with existing federal and voluntary frameworks wherever possible. Allowing companies to rely on comparable

disclosures that have already undergone verification and review, instead of creating separate and duplicative processes, would streamline compliance, improve consistency, and help ensure that resources remain focused on practical and measurable emissions reduction efforts.

Compliance Resources Could Be Redirected Toward Emissions-Reducing Investments

CRA is particularly concerned that the effort, staff time, and financial costs required to comply with the proposed rules, especially for Scope 3 calculations and biennial climate risk reporting, could divert resources away from direct emissions-reduction initiatives. Many corn refiners are undertaking significant sustainability projects, including:

- Deployment of lower-carbon energy systems
- Agricultural supply-chain partnerships that reduce upstream emissions
- Carbon capture and storage projects
- Increased use of renewable electricity

Compliance with the proposed regulations, especially in the early years, could demand substantial additional financial investment in data collection systems, third-party verification, internal reviews, and legal evaluations. CRA believes that these resources are most impactful when directed toward on-the-ground decarbonization rather than duplicative administrative processes.

Scope 3 Requirements

CRA is concerned that the requirement to report Scope 3 emissions is impractical and misaligned with the goal of producing accurate, decision-useful climate disclosures. Unlike Scope 1 and 2 emissions, Scope 3 emissions occur outside a company's direct control, making precise data collection and verification, in many cases, impossible. Companies are expected to rely on estimates from suppliers and distributors, many of whom may lack the capability or obligation to provide emissions data, resulting in inconsistent, unverifiable, and potentially misleading disclosures. Such inaccuracies create uncertainty for regulators, investors, and the marketplace. CRA urges CARB to reconsider the inclusion of Scope 3 emissions in the regulation.

We appreciate CARB's engagement with stakeholders and look forward to continued collaboration to develop a regulatory framework that is effective, efficient, and supportive of ongoing sustainability leadership.

Sincerely,

John W. Bode
President and CEO
Corn Refiners Association