

The Institute for Agriculture and Trade Policy (IATP)¹ submits the following feedback to inform CARB's approach to implementing Senate Bill 1383, which established short-lived climate pollutant reduction targets including a methane emissions reduction target for the dairy and livestock sector of 40% below 2013 levels by 2030.

In general, IATP urges CARB to require livestock operations to publicly report full supply chain emissions, with methane reported in native units (CH₄), and using absolute metrics at the facility level as opposed to intensity metrics which obscure the true impact of methane emissions. We also urge CARB to move away from funding anaerobic methane digesters, implement a 'Do No Harm' factor when evaluating new technologies and practices, and provide support for farmers to make the transition to lower methane emissions. The following feedback is a high-level, non-technical overview. We look forward to providing more feedback as requested by CARB throughout this process.

5) Were dairy and livestock operations required to report information to CARB, what types of data should be reported and at what level of detail and frequency?

Dairy and beef livestock operations should be required to publicly report their emissions of methane and other greenhouse gases in native units, as outlined by the Greenhouse Gas Protocol methodology. Reporting methane as CO₂ equivalent can mask the short-term impacts of methane emissions. Dairy and livestock operations should also be required to report herd and slaughter numbers on a regular basis to increase transparency and streamline third-party verification of methane emissions. Dairy and beef livestock operations should also report full supply chain emissions and any emissions related to the application of manure on land.

14) Given the requirements to deploy cost-effective and technologically feasible mitigation strategies, are there specific methane emissions sources or mitigation strategies that CARB should be prioritizing for the dairy and livestock sector that are not currently deployed?

CARB should **not** prioritize using public money to fund anaerobic digesters. Alternative manure management practices that avoid methane production altogether provide broader environmental and public health co-benefits than methane capture technologies tied to large confinement operations². The USDA has stopped providing loan guarantees for methane biodigester projects on large animal operations for the rest of 2026 due to financial concerns

¹ Institute for Agriculture and Trade Policy, [IATP](#).

² World Resources Institute, "Analysis of US Manure Management and Recommendations to Mitigate Associated Greenhouse Gas Emissions." August 6, 2025. [Analysis of US Manure Management and Recommendations to Mitigate Associated Greenhouse Gas Emissions | World Resources Institute](#)

related to high loan delinquencies and defaults on those projects.³ The USDA's action should spur states that support factory farm gas, like California, to thoroughly investigate the financial risk of these expensive projects.

17) What factors should CARB consider in evaluating whether an emerging technology or management practice is a viable methane emissions reduction option (e.g., effectiveness, availability, cost, market adoption rates, others)?

CARB should implement a 'Do No Harm' factor when evaluating new technologies or practices aimed at reducing methane emissions. New practices should not increase other forms of pollution, should not incentivize growth in herd size to promote more manure, should not favor large operations thereby driving further consolidation in the industry, and should not pose new risks to neighboring communities.

21) What objectives should CARB consider in developing methane reduction regulations pursuant to SB 1383?

The key objective should be to regulate dairy and livestock companies to support practices that reduce absolute methane emissions. To achieve this, CARB should provide clear guidelines for emissions reductions and resources for farmers to make this transition. Preexisting programs that support the transition from confinement operations to pasture systems should be fully funded.

23) In addition to the declining total annual statewide methane emissions from the dairy and livestock sector, what metrics are most representative of greenhouse gas improvement at a facility level (e.g., methane intensity per gallon of milk, per head of cattle, absolute reductions from each facility)?

CARB should prioritize metrics that reflect absolute methane reductions at the facility level, rather than relying primarily on intensity-based metrics. Intensity metrics can obscure rising total emissions associated with herd expansion, for example.

³ USDA, "Extension of the Temporary Administrative Pause on Biodigester and Controlled Environment Agriculture Applications Pending Continued Portfolio Performance Review." April 2, 2026. <https://d12v9rtnomnebu.cloudfront.net/diveimages/usda-rd-ul-continued-pause-CEA-biodigester-projects.pdf>