



Renewable Fuel Standard & Indirect Land Use

Request

Urge the EPA, White House and OMB to not include, in the proposed rule on RFS implementation, numbers on the life-cycle greenhouse gas emissions of vegetable oil biodiesel that are derived from EPA's current limited and flawed analyses. In their proposed rule, EPA should publish the assumptions and methodologies employed thus far in making their indirect land use calculations, and use the rulemaking process to further refine and improve the lifecycle analysis that will ultimately be used to implement the RFS program.

The approach EPA is expected to use for their proposed rule on RFS implementation is significantly flawed and would do unnecessary and irreversible harm to the competitive position of the U.S. soy biodiesel industry.

Background

The Energy Independence and Security Act (EISA) of 2007 created a Renewable Fuels Standard (RFS) for biomass-based diesel starting in 2009.

To be eligible for the RFS, biodiesel must meet a 50% greenhouse gas (GHG) reduction relative to petroleum diesel. When calculating the life cycle impact of biofuels, the statute directs EPA to consider direct & indirect emissions (such as indirect land use) of all stages of the fuel & feedstock production.

Without factoring indirect land use, EPA's models (GREET model) show vegetable oil biodiesel at 78% GHG reduction. However, the calculations pertaining to indirect land use being used by the EPA in crafting the proposed rule for the RFS-2 program are based on incomplete science and inaccurate assumptions. First and foremost, there are no generally accepted methods for determining indirect land use change. The assumptions being used by EPA do not take into account increased agricultural efficiencies and undervalue other factors outside of U.S. biodiesel production that have a far greater impact on international land use.

Furthermore, while the statute directs EPA to consider indirect emissions, it does not require or suggest that EPA should attempt to include *international* indirect emissions in their life-cycle analysis for biofuels. Such an approach is contrary to the intent of the RFS, is significantly flawed and inaccurate, and is detrimental to the overall goals of U.S. energy and environmental policy. The data and analysis on indirect land use is immature and more accurate and sound scientific analysis of the factors involved is needed.