



Indirect Land Use & the Renewable Fuel Standard (RFS-2)

Talking Points

- EPA should absolutely not include, in the proposed rule on the RFS-2, numbers on the life-cycle greenhouse gas emissions of vegetable oil biodiesel that is derived from their current limited and flawed analyses.
- EPA should publish the methodology used in making indirect land use assumptions, and use the rulemaking process to further refine and improve the lifecycle analysis that will be used to implement the RFS program.
- If soy biodiesel is excluded, the biomass-based diesel schedule under RFS-2 cannot be achieved.
- It was not the intent of Congress for soy biodiesel to be excluded. They would not have set the schedule at levels that can only be met if soy biodiesel is included.
- The 50% GHG level that biodiesel must meet is arbitrary.
- No accepted scientific methods for measuring indirect land use change.
- The International Standards Organization (ISO) has not published standards for analyzing indirect effects, and there is no accepted methodology.
- A lot of factors, such as urbanization, dietary changes, market economics, hardwood prices, etc. go into land use changes. U.S. biofuels cannot be singled out for responsibility for all land use changes.
- The statute does not require EPA to include *international indirect* emissions in their life-cycle analysis for biofuels.
- The indirect emissions of diesel (the baseline against which biodiesel is being measured) are not factored into the baseline.
- 111 scientists signed a letter opposing selective enforcement of indirect effects in the California Low Carbon Fuel Standards.