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EPA's RFS Proposal: One Step Forward ... and Another Step Back?

May 5, 2009 – For Immediate Release: By proposing to measure the substantial greenhouse gas emissions from land use changes that are indirectly caused by increased production of biofuels, EPA has taken an important step forward. But EPA has also proposed an accounting gimmick that would allow major increases in greenhouse gases to be averaged and discounted over a 100-year timeframe.

“EPA should be doing everything it can to figure out how to lower greenhouse gas emissions over the next few decades,” said Jonathan Lewis, an attorney with the Clean Air Task Force. “EPA’s proposed approach would perpetuate the use of corn ethanol and other outdated biofuels that contribute to global warming. We urge the Agency to reject the 100-year timeline and to adopt rules that ensure near-term greenhouse gas reductions.”

EPA’s proposed rule would implement revisions to the Renewable Fuel Standard enacted by Congress in 2007. The 2007 revisions included a sevenfold increase in the annual production mandate (from 5.4 billion gallons in 2008 to 36 billion gallons in 2022) and a requirement that new biofuels have lower net greenhouse gas emissions than petroleum-based fuels, taking into account the full lifecycle over which the fuels are produced and consumed.

The feedstocks used to make biofuels compete for land, water, and other agricultural commodities. Growing crops for energy in addition to food and feed requires the cultivation of additional land. In an increasingly globalized food market, the make-up food often will be grown where land and other agricultural inputs are the most inexpensive. As farmers and ranchers around the world respond by clearing forests, wetlands, grasslands, and other areas to make them suitable for agriculture, enormous quantities of soil- and plant-carbon are released into the atmosphere.

The large CO₂ release that occurs when a plot of land is cleared to indirectly accommodate biofuel production can be offset over time by the modest greenhouse gas reductions achieved by replacing petroleum with the biofuels produced from the energy crops harvested annually. The problem is that this process can take many years, especially for poor-performing fuels like corn ethanol. EPA calculates that under the best-case scenario, an increase in corn ethanol production will not provide net greenhouse gas reductions as compared to gasoline until 2055. In the intervening years, corn ethanol would produce a net *increase* in greenhouse gas emissions. Moreover, it is highly unlikely that a plot of farmland use to grow corn for ethanol in 2022 will still be used for that purpose in 2055, to say nothing of 2122 – meaning that the climate benefit projected by EPA will never be realized.

In light of the Obama Administration’s commitment to deep greenhouse reductions by mid-century, a policy proposal that endorses decades of greenhouse gas increases should be rejected out of hand. Nevertheless, by proposing an option to calculate the net climate impact of corn ethanol and other biofuels over a 100-year timeframe, EPA is considering an approach that would frustrate efforts to slash greenhouse gases by 2050. A shorter analytic timeframe – like the 30-year period also under consideration by EPA – would complement other climate stabilization policies.

EPA expects to issue a final rule implementing the RFS revisions later in 2009.

The Clean Air Task Force is a nonprofit organization with a mission to reduce and reverse the harmful human impacts on Earth’s atmosphere and related systems through scientific and policy research, business facilitation, and policy advocacy. Visit us at www.catf.us.