

EPA's RFS Proposal: Good Start, But GHG Measures Need Upgrading

Can Agency Protect the Science from Political Meddling?

September 25, 2009 – For Immediate Release: EPA has taken an important step forward by proposing to measure the substantial greenhouse gas emissions from land use changes that are indirectly caused by increased production of biofuels. But EPA should strengthen its modeling of those emissions, says the **Clean Air Task Force** in comments submitted to the Agency today, and it should scrap a proposed accounting gimmick that would allow major increases in greenhouse gases to be averaged and discounted over a 100-year timeframe.

The Clean Air Task Force comments can be downloaded at: www.catf.us/projects/climate/biofuels.

"EPA needs to rely on the best available methods for measuring the effect that biofuel production in the United States has on deforestation in the rest of the world," said Jonathan Lewis, an attorney with the **Clean Air Task Force**. Moreover, Lewis said, "EPA's rule has to provide reductions in greenhouse gas emissions over the next few decades – not 80 to 100 years from now."

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 must 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's proposed rule would implement revisions to the Renewable Fuel Standard enacted by Congress in 2007, which 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 natural land is cleared to directly or indirectly accommodate production of biofuel feedstocks can be offset over time as successive harvests of those feedstocks (corn, soy, etc.) absorb CO₂. 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. Instead, in the intervening years, corn ethanol would produce a net *increase* in greenhouse gas emissions. In its comments, the **Clean Air Task Force** helps EPA identify the state-of-the-art methods for modeling this impact.