

**ActionAid USA * Clean Air Task Force * Mighty Earth
National Wildlife Federation * Sierra Club**

October 16, 2017

Dear Senator,

In light of Congressional interest in the Environmental Protection Agency's recent move to consider lowering the Renewable Fuel Standard (RFS) mandates that affect biodiesel, we are writing to describe our support for such reductions. Increased production of food-based biodiesel threatens critical habitats around the world, disrupts food markets, and undermines the greenhouse gas reduction goals of the Renewable Fuel Standard (RFS).

Biodiesel made from recycled or waste feedstocks can provide a greenhouse gas savings benefit, but the large majority of biodiesel produced and consumed in the United States comes from virgin vegetable oils like soy and canola. By increasing overall demand for vegetable oils, the RFS raises food prices and spurs increased agricultural production, which in turn causes the destruction of native habitats and pollutes clean water supplies. Once emissions from related land use change are fully considered, the climate impact of food-based biodiesel is likely on par with or worse than that of fossil fuels. In short, conventional, food-based biodiesel is neither a 'green' fuel nor an effective climate change mitigation tool.

The EPA's unusual step of seeking comment on whether and how it should reduce the volume of biodiesel consumption that is mandated by the RFS in 2018 and 2019 is in response to both an increase in biodiesel blending costs and the likely imposition of countervailing duties on biodiesel imported from Argentina and Indonesia. More than 40 percent of the biodiesel used to comply with the RFS is imported. If the United States imposes duties on imported biodiesel without also reducing the relevant RFS consumption mandates, demand from the RFS could cause additional diversion of soy and other oilseed crops to the fuel market—at the expense of both the environment and food security.

The RFS promotes biodiesel consumption directly through the Biomass-Based Diesel mandate and indirectly through the so-called Advanced Biofuel mandate (diesel made from vegetable oil is typically the lowest cost option for meeting the overarching advanced mandate). Accordingly, our organizations have repeatedly urged EPA to reduce both mandates in order to limit RFS-driven demand for soy biodiesel and other vegetable-oil based diesel, and we support EPA's current effort to determine whether reductions to these RFS mandates are warranted.

Our groups support truly advanced biofuels made from ultra-low carbon, cellulosic feedstocks. Biofuels made from agricultural residue and cover crops, in particular, do not compete with

food crops or require significant additional land for production. Some can even improve sustainability. We encourage you to limit your support to the type of biofuels that have the potential to improve our environment and health.

We hope that we will have the opportunity to further discuss this issue with you and your staff, including ideas for reforming our fuel policies to be more environmentally friendly.

Sincerely,

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