



National Biodiesel Board
P O Box 104898
Jefferson City, MO
65110-4898
(573) 635-3893 *ph*
(800) 841-5849
(573) 635-7913 *fax*
www.biodiesel.org

June 30, 2009

Dear Biodiesel Stakeholder:

Today the National Biodiesel Board is launching our grassroots response to the Environmental Protection Agency's (EPA) proposed rule on the Renewable Fuel Standard (RFS-2). We are calling on you and all supporters of clean, renewable energy to join us in urging the EPA to implement a workable RFS-2 program. In December of 2007, Congress passed a law requiring that clean, renewable biodiesel be used to supplement the diesel fuel supply. Six months after they were required by law to have a program in place, the EPA proposed draft regulations that, if adopted, would make it extraordinarily difficult for the program to succeed as intended by the law.

In order to effectively participate in the program, biodiesel must qualify as an "advanced biofuel" and reduce greenhouse gas (GHG) emissions by 50%. The EPA has concluded that biodiesel derived from vegetable oils reduces greenhouse gases by only 22%. The proposed rule includes an analysis of biodiesel's lifecycle emissions, which would exclude all vegetable oils, or approximately 70% of the available raw material for biodiesel, from complying with the program. The EPA's conclusions are contrary to well documented, peer reviewed scientific evidence that has measured biodiesel from vegetable oil as reducing GHG emissions by approximately 80% when compared to diesel fuel.

The methodology employed by the EPA to determine biodiesel's GHG emission profile under the RFS-2 program is based on questionable inputs and dubious assumptions about international land use changes that assign future carbon emissions to U.S. biodiesel resulting from hypothetical land clearing on other continents that have nothing to do with U.S. biodiesel production or use. To further illustrate how these assumptions do not accurately reflect reality, we know that Brazilian soy acreage actually *decreased* during the time when U.S. biodiesel production grew from 25 million gallons in 2004 to 690 million gallons in 2008. If the EPA's assertions held water, the opposite would be the case.

The EPA's proposed regulations threaten to undermine a straight-forward energy policy that if implemented as proposed would put many small and medium biodiesel producers out of business. The EPA has the authority under the law to implement a workable RFS-2 program that will allow our nation to reap the economic, environmental and energy security benefits associated with the domestic production and use of biodiesel. However, in order to convince them, we believe it is imperative that biodiesel stakeholders and concerned citizens voice their support to the EPA for a workable, common sense RFS-2 program.

We need as many biodiesel supporters as possible to submit consistent comments. (**update:** the deadline for public comments has been extended to September 25). We have developed two sample comment documents. One is a shorter version that simply includes the top priority comments. The second is a longer version that includes more detail and arguments to support the comments. The longer version is preferred, but we have created the abbreviated version to make it faster and easier for you to complete the process and to ask that others complete it as well. We ask you to submit your comments right away and reach out to your friends, work colleagues, and professional networks to do the same. Visit the "[RFS-2 Action Center](#)" on our website to access all of the information and resources you need. The NBB will be submitting more comprehensive comments later in July on behalf of the industry that will address all aspects of the proposed program as well as technical data in support of our positions.

The future of the nation's energy policy and biodiesel's role in it is now at a critical point. Please join us in this landmark effort to help lead the nation forward toward a more sustainable, renewable, and prosperous future.

Sincerely,

A handwritten signature in black ink that reads "Joe Jobe".

Joe Jobe, CEO
National Biodiesel Board