

SABR Submits Comments on Proposed LCFS Cap for Soy, Canola Biofuels

The Sustainable Advanced Biofuel Refiners Coalition demonstrates to CARB how the proposal is unjustified and not supported by scientific evidence.

JEFFERSON CITY, MISSOURI, USA, August 29, 2024 /EINPresswire.com/ -- The Sustainable



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Mike Reed, CEO of RBF and SABR vice chairman of the board

Advanced Biofuel Refiners Coalition, a national biodiesel trade association made up of nearly 60 organizational members, submitted comments Aug. 27 to the California Air Resources Board on proposed changes to the state’s Low Carbon Fuel Standard [published](#) by CARB Aug. 12.

SABR’s top concern is the proposed 20% companywide cap on soy- and canola-based biomass-based diesel.

“This proposed measure is constructed around misplaced negative biases about modern production agriculture and based on contrived theories of indirect land-use change (ILUC) that have not held up to nearly two decades of actual scientific evidence and data,” SABR stated in its

comments. “The LCFS already has embedded layers of punitive measures against crop-based fuels that make the LCFS program more expensive with no added benefit. The proposed cap will make the program even more expensive and incentivize even more imports, most notably from China at the expense of America’s farmers and rural communities.”

Imports of questionable waste-based feedstock such as used cooking oil (UCO) from China have flooded the U.S. market over the past year, driving down soybean oil prices and putting billions of dollars of investments in expanding domestic oilseed processing capacity in jeopardy. If implemented, these proposed changes to the LCFS program would only exacerbate this issue.

Furthermore, theories and assumptions have been modeled for nearly 20 years to forecast future indirect land-use change, SABR noted.

“Those modeled forecasts have been used to assign penalties in real time in the form of carbon scoring to crop-based fuels,” the trade association stated. “We now have the benefit of hindsight

to look at two decades of historic data and determine whether the models produced accurate forecasts. They did not.”

The U.S. EPA and CARB have both long held onto misguided, unproven theories and assumptions that biofuels create significant indirect emissions while baseline petroleum creates none. These theories and assumptions did not factor in major technological developments in both the baseline petroleum and biofuel, making both assumptions wrong.

The U.S. continues to grow more crops on fewer acres nearly every year while fracking, for instance, has created significant land-use changes for baseline petroleum that can be seen from Google Earth.

There must be equitable treatment of direct and indirect effects for all energy options being scrutinized, SABR asserted.

“CARB has indicated plans to update all major models for lifecycle emissions calculations except for GTAP-BIO in the upcoming LCFS amendments,” SABR stated. “The soy industry has made vast improvements in sustainability and efficiency over the past two decades, with even greater improvement goals ahead. Yet CARB continues to rely on a 2014 model that uses data from 2004.”

CARB’s current modeling assigns soy biomass-based diesel with an ILUC impact of 29.1g CO₂e/MJ whereas updated results from the model used to calculate ILUC scores indicate a value of between 9 and 10 gCO₂e/MJ for soybeans.

Even more concerning is the double counting of already flawed indirect emissions at the federal and state levels. A single gallon of soy biodiesel, for instance, can take an ILUC penalty at the federal level and then again in California’s LCFS, as if the gallon were burned twice and the same exact land was converted two times. This double counting is already happening today with sustainable aviation fuel (SAF) under the federal SAF credit (40B) combined with the California LCFS.

This double counting could leave soy biodiesel with an ILUC penalty of 39.1 gCO₂e/MJ, nearly



four times what the GREET model assigns, despite the fact that there is no determinative scientific evidence biodiesel made from U.S.-grown soy causes any land conversion whatsoever.

“Such a flawed policy is already leading to an alarming spike in questionable UCO imports from China into California,” SABR stated. “These imports are displacing soybean oil, our nation’s most abundant and sustainable agricultural feedstock. This outcome results in bad carbon policy as well as bad agricultural, energy, trade and economic policy.”

At 150 million gallons per year, Houston-based RBF Renewable Biofuels is the largest biodiesel plant in the United States. Mike Reed, CEO of RBF and vice chairman of SABR’s board of directors, said, “Arbitrary and flawed state carbon policy, combined with inconsistent federal policy, is favoring imports over homegrown products by America’s farmers to fuel America’s truckers. U.S. soybean oil is one of the most abundant and sustainable feedstocks for biodiesel, which helps support tens of thousands of good-paying, green jobs in rural communities throughout our nation.”

SABR is urging CARB to reconsider its proposed changes based on 20 years of data-gathering and actual science rather than relying on future forecasts, failed ILUC theories, flawed assumptions and outdated data.

“There has been 20 years to prove the theory that land-use change would be caused by U.S. crop-based fuels, but there is more evidence to the contrary,” SABR stated. “This proposal is unjustified and not supported by scientific evidence and will significantly diminish the benefits of the LCFS policy. The preponderance of the scientific evidence indicates that crop-based biofuel does not result in land-use changes, and that the baseline petroleum does—yet CARB continues to assume the opposite.”

SABR CEO Joe Jobe said, “Soybean plants are nature’s solar panels. They harvest CO2 and sunshine to make liquid solar energy. We need more of this activity, not less—and America’s farmers are delivering. Thanks to broad adoption of precision agriculture and sustainable farming practices, America’s farmers are producing more crops on less acres with less inputs every year.”

To read SABR’s complete comments, click [here](#).

About the SABR Coalition

Sustainable Advanced Biofuel Refiners (SABR) is a coalition of stakeholders that have invested in building out America’s first advanced biofuel—biodiesel. Biodiesel is the most cost-effective means to reduce greenhouse gas emissions from medium- and heavy-duty vehicles, providing numerous economic, environmental and energy security benefits.

SABR represents every link in the biodiesel value chain from feedstock growers to biodiesel

producers, distributors, retailers and consumers, as well as infrastructure and products and services suppliers.

For more information, please visit www.sabrcoalition.org.

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