



CLEAN AIR  
TASK FORCE



MIGHTY EARTH

June 20, 2019

Dear Representative,

As organizations concerned about climate change, conservation, and food security, we are writing to communicate our concern about the potential reauthorization of the Biodiesel Tax Credit.

Although waste-based biodiesel appears to offer environmental benefits, most of the biodiesel consumed in the United States is made from virgin vegetable oils like soy, canola and palm. By increasing overall demand for vegetable oil, increased biodiesel production puts pressure on agricultural commodity markets and spurs increased agricultural production, which in turn causes the destruction of native habitats and pollutes clean water supplies<sup>1</sup>. 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<sup>2</sup>. In short, conventional, food-based biodiesel is neither a 'green' fuel nor an effective climate change mitigation tool.

A recent [New York Times and ProPublica investigation](#) (full article enclosed) into this issue revealed the links between U.S. policy supports for biodiesel and land conversion and climate emissions around the world, especially in southeast Asia. Due to food and land displacement issues, which provided large new markets for palm oil, U.S. policy supports for biodiesel from virgin oils can be directly linked to *“accelerated destruction of Borneo’s forests”* and *“the largest single-year global increase in carbon emissions in two millenniums, an explosion that transformed Indonesia into the world’s fourth-largest source of such emissions.”*

As you consider whether and how to offer tax credit support to various technologies through the energy extenders package, we urge you to refrain from subsidizing food-based biodiesel. A better path may be to narrow the scope of the credit to support only truly advanced biodiesels made from ultra-low carbon and waste-based feedstocks, like those that are given preference by the Low Carbon Fuel Standard programs in California and Oregon. We encourage you to limit

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<sup>1</sup> Searle, S. “How Rapeseed and Soy Biodiesel Drive Oil Palm Expansion.” The International Council on Clean Transportation. Briefing. July 2017; US Environmental Protection Agency (EPA), Biofuels and the Environment: The Second Triennial Report to Congress (2018 Final Report) (hereinafter “Second Triennial”), at 97 ([https://cfpub.epa.gov/si/si\\_public\\_record\\_report.cfm?dirEntryId=341491](https://cfpub.epa.gov/si/si_public_record_report.cfm?dirEntryId=341491)).

<sup>2</sup> Hugo Valin, *et al.* 2015. The Land Use Change Impact of Biofuels Consumed in the EU: Quantification of Area and Greenhouse Gas Impacts, at 39 (Fig. 15).

your support to the type of biofuels that have the potential to improve our environment and climate.

We hope that we will have the opportunity to further discuss this issue with you and your staff.

Sincerely,

Rose Garr  
Mighty Earth

Jonathan Lewis  
Clean Air Task Force

David DeGennaro  
National Wildlife Federation