

NOT ALL BIOFUELS ARE CREATED EQUAL

An Open Letter from 178 Leading Scientists and Economists

Dear Chairman Nichols,

As scientists and economists with relevant expertise, we are writing to recommend that you include indirect land use change in the lifecycle analyses of heat-trapping emissions from biofuels and other transportation fuels. This policy will encourage development of sustainable, low-carbon fuels that avoid conflict with food and minimize harmful environmental impacts.

Our comments are relevant to the development of California's Low Carbon Fuel Standard (LCFS), which the Air Resources Board (ARB) will consider for adoption in its April hearing, as well as other policies that evaluate lifecycle heat-trapping emissions from biofuels. For policies like the LCFS to successfully reduce GHG emissions, it is critical to include all major sources of emissions, including indirect land use emissions from biofuels.

Recent peer-reviewed research indicates that conventional biofuels can directly or indirectly result in substantial heat-trapping emissions through the conversion of forests and grasslands to croplands to accommodate biofuel production. Increased demand for crops to make fuel results in higher global commodity prices that can induce farmers in other countries to plow up sensitive, high-carbon ecosystems—including rain forests in South America and Southeast Asia. Previous lifecycle analyses did not adequately account for these emissions, giving biofuels credit for greater carbon savings than actually achieved.

Strategic investment decisions should be based upon the best available data of the carbon footprint of alternative fuels. Failure to include a major source of pollution, like indirect land use emissions, will distort the carbon market, suppress investment in truly low carbon fuels, and ultimately result in higher emissions.

The work you are doing in California sets an important precedent for transportation fuel policy nationally and internationally, as well as for action to confront climate change more broadly. **We urge you to ensure that your policies are based on the best science, including consideration of emissions from indirect changes in land use.**

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