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Comments from National Biodiesel Board
Re: Proposed Corn Oil Pathway
February 23, 2011

The National Biodiesel Board would like to indicate its support to the methodology CARB staff have used to assess the greenhouse gas emissions for biodiesel made from inedible corn oil.

Noting the time constraints of the hearing, I will limit my comments to a few of the most critical points.

First, it is our view that GHG modelers who are contributing to government policy should strive for consensus whenever possible – especially when policies overlap, which could be the case with the federal Renewable Fuel Standard and the California low carbon fuel standard. On this point, we commend the staffs at CARB and U.S. EPA for using the same approach for GHG assessment for biodiesel made from inedible corn oil. This type of outreach and consensus building is something we continue to appreciate about CARB processes.

Second, inedible corn oil has characteristics very similar to used cooking oil and other waste feedstocks. The only way that corn oil extraction could have a positive impact on the corn ethanol pathway is if one argued that inedible corn oil displaces soybean oil or beef tallow in the marketplace. Considering inedible corn oil's high free fatty acid content, however, this would be a very difficult case to make.

Third, lifecycle analysis protocols developed by the International Standards Organization (or ISO), if not always adopted by modelers, should always be given strong consideration. ISO recommends avoiding allocation of GHG emissions between co-products and using a consistent approach between products. Mixing allocation approaches within the same analysis typically causes more problems than it addresses. Therefore, in our view, CARB staff – and U.S. EPA, for that matter – have used the most reasonable displacement method in the analysis that is being presented to the board today.

Finally, we wish to thank CARB staff members for their openness and continued efforts to develop consensus approaches to answering very difficult questions.

Shelby Neal
Director of State Governmental Affairs