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For Immediate Release:

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### **Advanced Biofuels USA Urges California Air Resources Board to Reject Use of Indirect Land Use Change in Low Carbon Fuel Standard Analysis**

A proposal before the California Air Resources Board (CARB) would base critical greenhouse gas emission regulations on an untested theory of indirect land use that postulates a direct correlation between any US agricultural actions and those taken anywhere else on the planet. Furthermore, supporters of this theory claim it should be used to analyze greenhouse gas emissions for the California Low Carbon Fuel Standard because it is “our best estimate of carbon discharges” despite that fact that no empirical evidence has been put forth that supports this theory.

“Advanced Biofuels USA does not think ‘best estimates’ meets even the basic standards of scientific inquiry,” states Joanne Ivancic, Executive Director. “Furthermore, the theory of indirect land use is not backed by an adequate level of scientific understanding to be used to regulate the impact of greenhouse gas emissions from biofuels,” said Ms Ivancic.

This is the same position stated by 110 researchers in the field of biomass to bioenergy conversion in a recent letter to the Governor of California. They concluded that the indirect land use rules being considered for inclusion in the CARB low-carbon fuel regulations are far too uncertain and limited in effect to meet regulatory standards and would result in selective enforcement.

Advanced Biofuels USA supports the use of empirically based system analyses of all fuels that would be used to supply power for transportation. “It is important that a level playing field, based on all energy inputs, environmental effects, and additional economic costs, be created for regulatory purposes,” Ms. Ivancic stated. Specific issues that must be addressed include:

- All energy lost (approximately 60%) in the generation and transmission of electricity used to recharge electric and plug-in hybrids must be accounted for. Since most of this is from non-renewable fuels, significant GHG emissions must not be missed.
- The energy and GHGs used to extract and concentrate uranium to electrical production levels and the energy/GHGs and costs required for the secured long-term storage of spent fuel must be accounted for. In addition, the national security costs of relying on imported sources of uranium must be included.

- The environmental damage caused by petroleum extraction in sensitive ecosystems, including the Arctic and tar sand basins, and the energy and GHGs produced to remediate them must be accounted for.
- The energy and GHGs used to produce batteries for hybrids and electric cars (above that used to produce baseline gasoline vehicles) must be accounted for. The energy and GHGs required to dispose of batteries in an environmentally neutral manner must be accounted for, as well.
- The production conditions of the base case gasoline fuel must include sources that would be used post-2012 in order to provide a comparable case to advanced biofuels which are projected to reach the market by that date. This would mean including the costs and GHG effects of using tar sand, deep ocean, and Arctic petroleum.
- The calculation of GHG effects of biofuels must include provisions for future GHG reductions. These include: nutrient input reductions, reductions in use of food crops, reductions in non-renewable fuel use for farming and processing, innovations in biomass sources and biomass conversion, recycling of CO<sub>2</sub>, and increases in the energy content of the fuel. This is especially important since the advanced biofuel industry is in its infancy, comparable to the petroleum industry in the early 20<sup>th</sup> century, and many of the possible improvements have not even made it into labs for testing.

“California will be making a crucial decision when they consider Low Carbon Fuel regulations,” said Ms. Ivancic. “The right approach will spur industry and consumers to an innovative affordable low greenhouse gas future. A wrong decision will misdirect scarce funds to hyped solutions such as plug-in hybrids that will not benefit the citizens of California or the United States.”

#### **110 Scientists Complain that California promotes fossil fuels**

[http://www.greenpowerconferences.com/wbm\\_2009/documents/LettertoSchwarzneggerCalifornia110scientists.pdf](http://www.greenpowerconferences.com/wbm_2009/documents/LettertoSchwarzneggerCalifornia110scientists.pdf)

#### **Growth Energy Policy Brief: California’s Dangerous Gamble with Indirect Land Use Change**

<http://www.growthenergy.org/2009/reports/GE-Policy-Briefing-on-California.pdf>