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## EPA Biofuels Rules Must Reflect Respected, Peer-Reviewed Science

Advanced Biofuels USA urges EPA, along with Congress and an engaged and informed public to carefully craft greenhouse gas emissions regulations and legislation with an eye to the following principles:

- Greenhouse gases, including carbon dioxide, regardless of source, should be assessed accurately and fairly.
- A “level playing field” should be established that not only takes into consideration the emissions from new biofuels compared to gasoline, but also any fuel (including coal, nuclear, etc.) which power cars, trucks, trains and planes.
- **If** the evaluation of greenhouse gas emissions’ impact for biofuels is calculated “from seed to wheel,” **then** evaluation of other transportation power sources (including petroleum, natural gas, compressed natural gas, nuclear, coal, hydropower, solar, wind, etc.) should be calculated “from mine to wheel.” Factors which should be considered include greenhouse gas emissions related to:
  - Extraction
  - Transportation
  - Providing security for extraction and transportation (including military GHG emissions)
  - Construction of production and distribution equipment, facilities and infrastructure (including that related to manufacturing batteries for electric cars)
  - Refining of the fuel or of substances such as uranium crucial to producing the fuel or storing power
  - Planting, cultivation, harvest
  - Production
  - Distribution
- We must be serious about all aspects of land use and their impact on greenhouse gas emissions. This includes considering the conversion of agricultural land to residential and industrial use; not only the conversion of agricultural or fallow lands to energy crop production. And land use changes resulting from damming of streams for hydroelectric power.
- We must use peer-reviewed, respected science to make these assessments.

**Advanced Biofuels USA** is a nonprofit organization. Its purpose is to promote public understanding, acceptance, and use of advanced biofuels; to promote research, development and improvement of production, marketing and delivery of advanced biofuels; and to improve advanced biofuels crops and products.