

Mr. Chairman, members of the committee, thank you for the chance to share my views regarding the opportunities and challenges of implementing the Renewable Fuels Standard (RFS). My name is Nathanael Greene. I'm a senior policy analyst for the Natural Resources Defense Council (NRDC) and one of our main experts on renewable energy technologies.

At NRDC, we believe that biofuels from biomass produced following environmental safeguards, processed efficiently and used in efficient vehicles can reduce our dependence on oil, reduce emissions of global warming pollution, contribute significantly to a vibrant farm economy, and avoid impacting food prices.

However, pursued without adequate safeguards and standards, large-scale biofuels production carries grave risk

to our lands, forests, water, wildlife, public health and climate.

The new Renewable Fuel Standard was a major step forward for our biofuels policies—a step away from the “more is better” approach that has dominated our policies towards a “better is better” approach. The latest research confirms Congress’ foresight in crafting the RFS to do the following four things:

- 1) Set minimum lifecycle GHG emissions standards for all biofuels from new facilities.
- 2) Define lifecycle greenhouse gas emissions to include the all the emissions from the full cycle from cultivation, production, through combustion and specifically to include both the direct and indirect emissions from land-use change. Accounting for emissions from land-

use change is the most important step to producing low-carbon biofuels and taking biofuels out of the food price equation. It is through increasing the competition for arable land that biofuels face the greatest risk of increasing global warming pollution and driving up food prices

3) Encourage production of plentiful biofuels feedstocks—including woody-biomass—while ensuring the RFS mandate does not drive the destruction of old-growth forest, native grasslands, and imperiled ecosystems, or the degradation of our federal forests. These land and wildlife safeguards are critical to getting biofuels right. Proposals like H.R. 5236 to remove the protections would turn biofuels done right into biofuels done wrong.

4) Require the vast majority of new biofuels required under the law be advanced biofuels derived from renewable cellulosic biomass and provide a lifecycle greenhouse gas emissions reduction of at least 60 percent.

The effectiveness of the RFS depends entirely on EPA's implementation of these critical provisions. EPA has good momentum from work they were doing to implement the President's 20-in-10 executive order, but aggressive and effective implementation will require resources and monitoring. Congress should make sure EPA is fully funded and monitor EPA's progress closely to ensure that science rather than politics drives the resulting regulations.

New crops and conversion technologies are developing rapidly that will make it easier to produce lots of biofuels

with a smaller environmental footprint and without impacts on food prices, but the technologies are not a guarantee of good environmental performance. Just because we can do it right does not mean that we will.

We need to maintain the environmental safeguards and performance standards in the RFS and build on them, guiding the market so that innovation and competition will drive biofuels to provide the greatest benefits.

Looking beyond the RFS, Congress should:

- 1) Adopt a low-carbon fuel standard, as California and Massachusetts are planning to do.
- 2) Pass comprehensive climate legislation built around a mandatory, economy-wide carbon cap and a carbon credit trading system.

3) Reform the various existing biofuels tax credits and import tariffs to be a single technology-neutral, performance-based credit to encourage water efficiency, reduced water pollution, better soil management, and enhanced wildlife management.