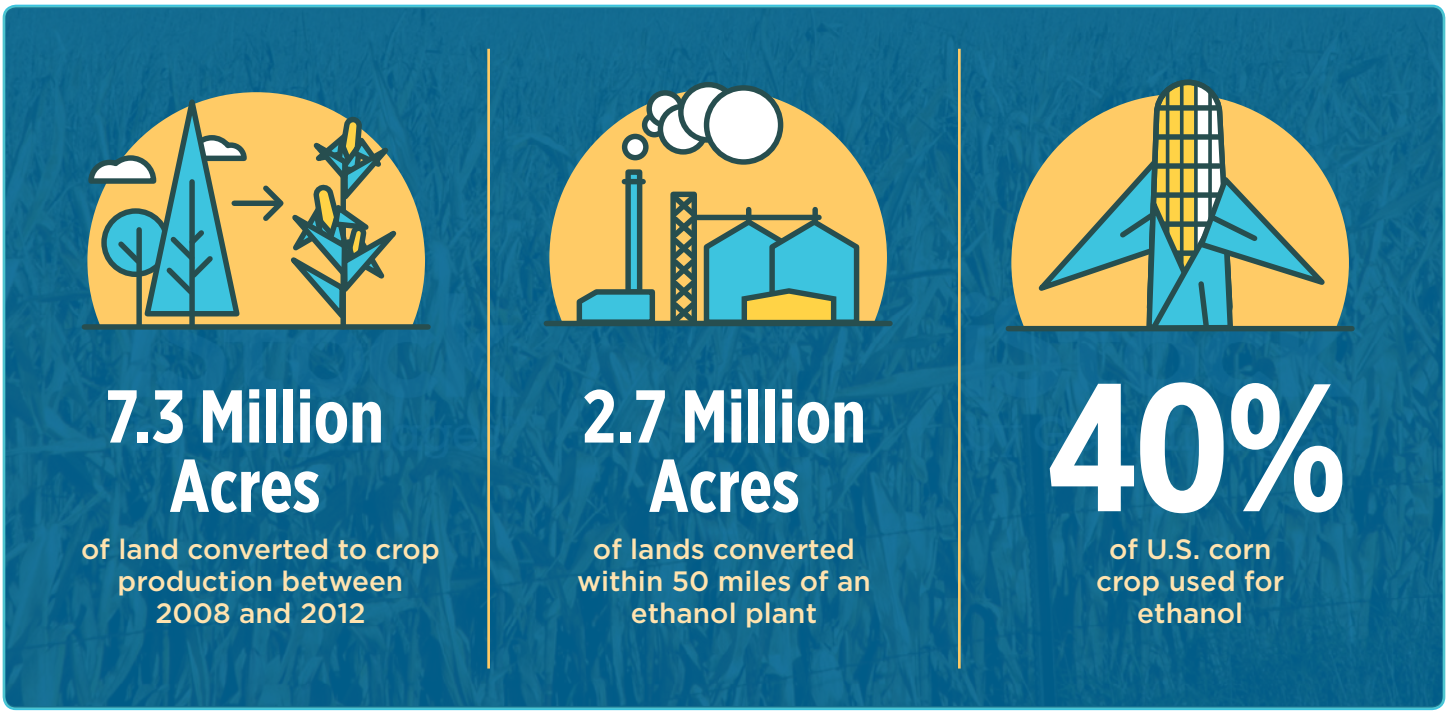
ENVIRONMENTAL PRINCIPLES TO REFORM THE ETHANOL MANDATE

When Congress first adopted the Renewable Fuel Standard (RFS) it was with the worthy intent of incentivizing homegrown, renewable fuels that would reduce the United States' dependence on fossil fuels and decrease the amount of carbon in the atmosphere. Unfortunately, since the standard's adoption in 2007, it has become clear that the RFS has had unintended and devastating consequences for wildlife and wildlife habitat, and may even be undermining its own stated goals.[1]

A nationwide study from researchers from the University of Wisconsin found that over 7.3 million acres of land — mostly grasslands — were converted to crop production between 2008 and 2012.[2] While it was not the RFS alone that caused these changes, the standard played an undeniable role in the cultivation of native habitat for crop production.[3] Furthermore, these negative impacts have accrued alongside the failure to realize the reductions in carbon emissions promised at the law's passage.[4]

And while the increased planting of corn for ethanol and soy for biodiesel has led to habitat destruction and water quality impacts, the next generation of cellulosic biofuels (those made from grasses, trees, and wastes) stand to result in much more positive environmental outcomes. Given that the RFS, as currently constructed, has not led to the expansion of cellulosic biofuels at nearly the pace envisioned by the standard's supporters, changes must be made to place greater emphasis on fostering the development of these promising but still developing technologies and feedstocks, while de-emphasizing the production of ethanol and biodiesel and mitigating their effects on habitats. In recognition of the impacts to soil, water, and wildlife, there must be meaningful enforcement and strengthening of the habitat safeguards currently in the RFS that are not being implemented. There must also be greater commitment to habitat conservation in order to mitigate the negative effects of the expanded, intensified agriculture production fueled, in part, by the ethanol mandate. In order to achieve these conservation goals in a timely and sustainable manner, an RFS reform package must encompass the following basic principles.



PRINCIPLES FOR RENEWABLE FUEL STANDARD REFORM:

1. The corn ethanol mandate needs to be significantly decreased and fuels made from corn kernels should no longer be permitted to qualify for the advanced biofuels pool.
2. A limit should be placed on biodiesel produced from virgin vegetable oil, and biodiesel should no longer be counted toward the conventional biofuels pool.
3. Cellulosic and advanced biofuels should receive the appropriate incentives that will truly foster the development and production of modern biofuels
4. The Renewable Fuel Standard should more effectively prohibit the future conversion of native habitat to cropland, and disallow any fuels produced on cropland brought into production after the standard's 2007 passage from qualifying for credit, as verified at the field scale rather than in aggregate.
5. In order to mitigate the vast amount of wildlife habitat that has been lost in large part to the expansion of corn for ethanol, a conservation mitigation fund to support habitat and water quality restoration and conservation should be linked to the Renewable Fuel Standard.
6. No other changes to the Clean Air Act should be considered as part of any Renewable Fuel Standard reform effort.
7. The standard should be clarified to prohibit the cultivation of invasive or noxious plants for biofuels and state that such biofuels would not meet the Renewable Fuel Standard mandate.

ENDNOTES

1 Searchinger et al, 2008. Science. "Use of US Croplands for Biofuels Increases Greenhouse Gases Through Emissions from Land-Use Change."
2 Lark, et al, 2015. "Cropland expansion outpaces agricultural and biofuel policies in the United States." Environmental Research Letters 10, 4.
3 Wright, et al, 2017. "Recent grassland losses are concentrated around U.S. ethanol refineries." Environmental Research Letters 12, 4.
4 Government Accountability Office. http://www.gao.gov/assets/690/681252.pdf

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