



June 9, 2020

The Honorable Andrew Wheeler
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, N.W.
Washington, DC 20460

Re: Biogenic CO₂ Emissions, Annual Crops

Dear Administrator Wheeler:

We understand that EPA has a proposed rule currently under OMB review that would determine that combustion of woody biomass is carbon neutral and make corresponding changes to EPA regulations. Doing so would be a positive first step towards acknowledging that biogenic emissions are not a net source of greenhouse gas emissions. But that proposed rule would miss an opportunity to provide the same clarification for an additional category of feedstocks that is just as carbon neutral: annual agricultural crops. The Biogenic CO₂ Coalition therefore writes to urge EPA to seek comment on the regulatory treatment of biogenic CO₂ from annual agricultural crops.

The Biogenic CO₂ Coalition represents growers and processors of various agricultural crops. Our members and other participants in the bioeconomy together feed the nation and provide important bioproducts, including medical-grade alcohol and bioplastics. The bioeconomy is an important source of jobs and economic development in rural America and is poised to grow further, unless unsound regulatory roadblocks hold it back. One such roadblock is EPA's failure to make clear that processing of agricultural crops makes no more than a de minimis contribution to carbon emissions, which results in costly regulatory and permitting requirements that discourage investment.

The science is clear that, like woody biomass, annual agricultural crops are not a net source of carbon emissions. Indeed, the main relevant difference between woody biomass and annual agricultural crops is that annual crops grow to maturity in a single year—carbon emitted from processing of annual agricultural crops is therefore replaced rapidly when the next year's crops are grown. The Department of Agriculture, the IPCC, and various researchers have each recognized that the carbon sequestered by growing agricultural crops cancels out or even outweighs the carbon emitted when those crops are processed. And EPA has recognized the same in other regulatory programs that rely on the GREET model.



In light of that scientific consensus, the Biogenic CO₂ Coalition respectfully urges EPA to request comment in the preamble to its pending proposed rule on whether to find that biogenic emissions from processing annual agricultural crops at stationary sources are carbon neutral or a *de minimis* source of carbon. We also urge EPA to request comment on whether facilities that process annual agricultural crops should therefore be exempt from implementing BACT and other requirements of the PSD and Title V programs for the greenhouse gasses emitted from the processing of annual crops. Including those requests for comment in the proposal would give the Biogenic CO₂ Coalition and other stakeholders the opportunity to provide EPA with information to help it finalize an action regarding emissions from annual agricultural crops.

We appreciate your work on these important issues. Please let us know if you have any questions—we would welcome the opportunity discuss with you further and share the scientific materials described above. John Bode, Chair of the Biogenic CO₂ Coalition, can be reached at jbode@corn.org or (202) 534-3499.

Sincerely,

A handwritten signature in black ink, appearing to read "John Bode".

John Bode

Biogenic CO₂ Coalition

- American Farm Bureau Federation
- Corn Refiners Association
- National Corn Growers Association
- National Cotton Council of America
- National Cottonseed Products Association
- National Grain and Feed Association
- National Oilseed Processors Association
- North American Millers' Association
- Plant Based Products Council

cc: Mandy Gunasekara, Chief of Staff, Office of the Administrator
Anne Idsal, Acting Assistant Administrator, Office of Air and Radiation
Carrie Meadows, Agricultural Advisor to the Administrator