



October 9<sup>th</sup>, 2020

The Honorable Andrew Wheeler  
Administrator  
US Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**Re: Biogenic Carbon Emissions from Agricultural Crops**

Dear Administrator Wheeler:

On behalf the numerous farmers, workers, business owners, community members that our state agricultural departments serve, we urge the Environmental Protection Agency (EPA) to recognize the *de minimis* character of biogenic carbon emissions released from agricultural crops when they are used to generate food, fuel, beverages, or bioproducts. This common-sense clarification would align EPA policy with the biogenic emissions standards applied by every other regulatory authority worldwide and acknowledge that biogenic carbon emissions from agricultural feedstocks are different than carbon from fossil fuels.

EPA's current policy contrasts with strong scientific consensus that biogenic CO<sub>2</sub> emissions from annual crops are insignificant additions to atmospheric greenhouse gases (GHGs). A recent letter signed by 21 leading climate scientists urges EPA to acknowledge the basic science of carbon lifecycles, calling current policy a regulatory burden "without scientific justification." A scientific literature review found that 104 out of 108 relevant academic articles classified biogenic carbon emissions from annual crops, perennials and other biomass as carbon neutral. The U.S. Department of Agriculture also has asked EPA to reconsider its position based on scientific consensus.

By clarifying the insignificant nature of biogenic carbon emissions annual agricultural crops, EPA can open the door for increased production of sustainable, plant-based products and materials with a wide range of environmental benefits in the United States. Expanded production of plant-based products and materials, and in turn, the growth of the U.S. bioeconomy, promises to substantially reduce GHGs, improve water quality, divert waste from landfills, and augment soil health. For all of these reasons, accelerated production of sustainable alternatives to petrochemical based plastics will reap significant environmental benefits to the US and serve an urgent global need.

A regulatory policy clarification is also important from an economic perspective. The U.S. farm economy this year entered the eighth year of an economic downturn, with net farm incomes and commodity prices in freefall, and bankruptcy filings and farm real estate debt skyrocketing. According to data from

USDA and the American Farm Bureau Federation, net cash income for farmers has declined by 29% since 2012 and Chapter 12 bankruptcies are up 24% in the last year alone. Unfortunately, COVID-19 has accelerated the collapse of an already tenuous financial situation in the farm sector. The Food and Agricultural Policy Research Institute at the University of Missouri expects prices for crops to drop by as much as 10% as a result of the coronavirus pandemic.

During this global pandemic and economic recession, EPA has a critical opportunity to unleash millions of dollars in new investments and return the focus to job growth in the American heartland. U.S. agribusinesses require clarity in order to make significant investments in new technology, facility modernization and infrastructure that can support the development and production of renewable products and materials, a significant contributor to the U.S. bioeconomy. The U.S. bioeconomy currently has massive underutilized potential, especially in rural farm communities. According to USDA, America's bioeconomy currently contributes \$459 billion in economic value and provides 4.6 million American jobs. Yet, the U.S. bioeconomy currently accounts for less than 5% of American economic activity.

EPA's policy on biogenic carbon emissions from agricultural crops creates a regulatory barrier and uncertainty that deters much-needed investment in renewables from rural America and incentivizes that investment to go elsewhere. Without regulatory clarity, a significant opportunity for rural economic development will be missed and American farmers will face an even greater disadvantage against overseas' competitors. We respectfully urge EPA to take prompt action to recognize the *de minimis* character of biogenic emissions from agricultural crops. Thank you for considering of our request.

Sincerely,

A handwritten signature in black ink that reads "Barbara P. Glenn". The signature is written in a cursive, flowing style.

**Barbara P. Glenn, Ph.D.**  
*Chief Executive Officer*