## National Scientists and Economists Statement on Biofuels and Land Use

A LETTER TO U.S. LEGISLATORS AND REGULATORS Signatories Updated as of 10/23/2009

As scientists and economists with relevant expertise, we are writing to recommend that indirect land use change is included in the lifecycle analyses of heat-trapping emissions from biofuels. This will encourage development of sustainable, low-carbon fuels that avoid conflict with food and minimize harmful environmental impacts.

Our comments are relevant to the federal Renewable Fuel Standard, biofuels legislation included in federal climate and energy legislation, and other federal, state or regional laws and regulations pertinent to biofuels. For policies like these to successfully reduce GHG emissions, it is critical to include all major sources of emissions, including indirect land use emissions from biofuels.

Recent peer-reviewed research indicates that conventional biofuels can directly or indirectly result in substantial heat-trapping emissions through the conversion of forests and grasslands to croplands to accommodate biofuel production. Increased demand for crops to make fuel results in higher global commodity prices that can induce farmers in other countries to plow up sensitive, high-carbon ecosystems--including rain forests in South America and Southeast Asia. Previous lifecycle analyses did not adequately account for these emissions, giving biofuels credit for greater carbon savings than actually achieved.

There are uncertainties inherent in estimating the magnitude of indirect land use emissions from biofuels, but assigning a value of zero is clearly not supported by the science. The data on land use change indicate that the emissions related to biofuels are significant and can be quite large. Grappling with the technical uncertainty and developing a regulation based on the best available science is preferable to ignoring a major source of emissions. Over time, greater accuracy and detail in a more refined analysis can be integrated into any well-constructed biofuels policy.

The need to address uncertainties applies to other areas the analysis as well, and we urge you to evaluate the increasing use of nitrogen fertilizers and herbicides associated with greater biofuel production. In particular, nitrogen fertilizers enhance the emission of nitrous oxide--a powerful greenhouse gas in Earth's atmosphere.

The timeframe of the lifecycle analysis has a major impact on the relative importance of emissions from land use change, with very long timeframes diluting the impact of land use change. Climate benefits attributed to biofuel production 50 to 100 years in the future are highly uncertain, and add unnecessary speculation to the analysis. The analytical timeframe should be limited to the foreseeable future, no more than a few decades,

anchored by the lifetime of fuel production facilities and the rate of technological change in agriculture, transportation and climate mitigation.

To spur innovation in low carbon fuels, sound biofuels policies must send an accurate signal to the growing clean energy market. Strategic investment decisions should be based upon the best available data of the carbon footprint of alternative fuels. Failure to include a major source of pollution, like indirect land use emissions, will distort the carbon market, suppress investment in truly low carbon fuels, and ultimately result in higher emissions.

We therefore urge that all future biofuels policies are based on the best science, including consideration of emissions from indirect changes in land use.

Sincerely,

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