



Biotechnology Innovation Organization
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VIA ELECTRONIC SUBMISSION

<http://www.regulations.gov>

EPA-HQ-OAR-2021-0921

Re: Greenhouse gas modeling in biofuels and non-fuel advanced bioproducts

The Biotechnology Innovation Organization (BIO) is pleased to submit these comments in response to the U.S. Environmental Protection Agency's (EPA's) February 28-March 1, 2022, workshop on biofuel greenhouse gas modeling.

Introduction

BIO¹ represents 1,000 members in a biotech ecosystem with a central mission – to advance public policy that supports a wide range of companies and academic research centers that are working to apply biology and technology in the energy, agriculture, manufacturing, and health sectors to improve the lives of people and the health of the planet. BIO is committed to speaking up for the millions of families around the globe who depend upon our success. We will drive a revolution that aims to cure patients, protect our climate, and nourish humanity.

Biofuel Greenhouse Gas Modeling

BIO is encouraged by the breadth of topics covered at the workshop and commends EPA for cohosting the workshop with the U.S. Department of Agriculture (USDA) and the Department of Energy (DOE). Implications of these efforts will span programs across the federal government, including the treatment of co-products created in the production of biofuels and non-fuel carbon scoring decisions. However, as EPA itself stated, this is only the first step in the process. BIO urges the agency to engage stakeholders throughout the process to ensure updated data and modeling decisions do not introduce new barriers to innovation.

Advancing biofuel innovation is crucial to agriculture being part of the solution to the climate crisis and fostering energy security. EPA must update regulatory requirements for greenhouse gas emissions analysis to reflect the newest science and technology. Relying on a single, stagnant version of a model jeopardizes the integrity of EPA processes and long-term decision making. Enabling the use of up-to-date modeling tools and data will permit the agency to capture improvements in agricultural efficiency and deployment of innovative technologies. BIO recommends EPA work with DOE to incorporate the Department's Argonne National Lab Greenhouse gases, Regulated Emissions, and Energy use in Transportation (GREET) model for measuring lifecycle emissions of transportation fuels. BIO also

¹ <https://www.bio.org/>



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urges EPA to coordinate with USDA and utilize its practical knowledge and expertise on biofuels and innovative farming techniques.

Conclusion

It is vital for EPA to evaluate the current scope of tools and data for the evaluation of greenhouse gases from biofuels. The impact of this effort will reach beyond a single program. Ensuring accurate accounting for the GHG reductions possible through the deployment of existing and emerging biotechnology is crucial for maximizing innovations in the bioeconomy.

A handwritten signature in black ink, reading "Sarah Gallo". The signature is written in a cursive, flowing style.

Sarah Gallo
Vice President, Agriculture and Environment
Biotechnology Innovation Organization