american cleaning institute®
for better living

July 23, 2013

Honorable Ed Whitfield
Chairman
Energy and Power Subcommittee
Committee on Energy and Commerce
United States House of Representatives
Washington, DC 20515

Honorable Bobby L. Rush
Ranking Member
Energy and Power Subcommittee
Committee on Energy and Commerce
United States House of Representatives
Washington, DC 20515

RE: Subcommittee Hearing on the Renewable Fuel Standard (RFS): Stakeholder Perspectives

Dear Chairman Whitfield and Ranking Member Rush:

The American Cleaning Institute® (ACI) welcomes the interest of the subcommittee on stakeholder perspectives regarding the Renewable Fuel Standard (RFS). ACI is the trade association representing the $30 billion U.S. cleaning products market. ACI members include the formulators of soaps, detergents, and general cleaning products used in household, commercial, industrial and institutional settings as well as companies that supply ingredients, including oleochemical manufacturers, and finished packaging. ACI and its members are dedicated to improving health and the quality of life through sustainable cleaning products and practices, and its mission is to support the sustainability of the cleaning products industry through research, education, outreach and science-based advocacy.

The U.S. oleochemical industry has been disadvantaged by federal biofuel subsidies in the form of tax credits and guaranteed markets under the RFS. Oleochemicals are chemicals made from animal fats, an agricultural commodity, and seed oils including fatty alcohols and fatty acids that have wide ingredient application in industrial and consumer products. Oleochemicals are the original "green chemistry" and the domestic oleochemical industry provides direct and indirect employment for an estimated 25,000 people.

The price of animal fats, a co-product of livestock slaughter, has been significantly impacted by the RFS in its establishment of guaranteed markets for categories of biofuels. Animal fats provide raw material for traditional biodiesel as well as advanced biofuels. Animal fats are considered biomass for purposes of the RFS. ACI respectfully urges that animal fats be eliminated as a qualifying commodity under the RFS. This policy change would serve to eliminate the disadvantage currently imposed on oleochemical producers and return balance to the market.

Thank you for your attention and consideration of these comments; I may be reached at (202) 347-2900 or via electronic mail at dtroutman@cleaninginstitute.org.

Respectfully yours,

Douglas Troutman
V.P. & Counsel, Government Affairs

cc: Members of the Subcommittee on Energy and Power

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