

Responses for the record from Randy Howard

1. What are the main regulatory barriers that are preventing the growth of Advanced Biofuels in America?

The main barrier to the growth of Advanced Biofuels has been the inconsistency to which the RFS has been enforced and the uncertainty created by continued attacks and, until recently, inability to move the annual RVO's in a timely and consistent manner. Additionally, there are a number of pathways that have been under consideration for a prolonged period of time at the EPA that would help provide for additional feedstocks and higher volumes of advanced biofuels. Also, EPA must look at how the expansion of feedstocks for advanced biofuels have significantly enhanced value-added agriculture, as well as added value to rural economies and the transport industry. It is wrong for EPA to only consider what effect the RFS has on the petroleum industry. Congress intended the RFS to have benefits beyond the energy sector, and those benefits are well documented. Biodiesel and renewable diesel are the best examples of how the RFS is achieving the congressional intent of this right-thinking policy and we can do so much more with regulatory improvement and certainty.

2. Is there a potential scenario where Advanced Biofuels could successfully compete and participate in the market without the Renewable Fuel Standard?

The intent of Congress with the RFS was to create and foster an alternative to petroleum fuels that would enhance our energy and environmental security. While biodiesel and renewable diesel are doing just that in filling the vast majority of the Advanced Biofuel category, both are still very young industries, especially renewable diesel. Consistent federal policy that will allow these advanced biofuels to better establish the infrastructure and production levels for long term sustainability are still necessary to fulfill the full congressional intent of the RFS. The transportation fuels market is not a free market and has not been for a century. It has been a petroleum monopoly. The RFS has helped open the transportation fuels market to renewable fuels, despite constant opposition and misinformation by the petroleum industry, which has kept us from seeing the full potential of advanced biofuels. This is why this forward looking policy should be enhanced, not pulled back.

3. What are your views on the EPA's proposed Renewables Enhancement and Growth Support (REGS) Rule?

The REGS proposal is a good start to providing improved regulatory certainty and future feedstock development in Advanced Biofuels. It is unfortunate that the EPA has held back the rule-making process on the REGS rule and we are hopeful that they can soon resume work on this very important issue.