

MICHIGAN CHAPTER

Sierra Club Opposition (as currently written) HB 4847

May 15th, 2024

Dear Chair Neeley and members of the Committee,

On behalf of our 150,000 members and supporters in Michigan, the Sierra Club is writing today in opposition to HB 4847 as it is currently written. Biodiesel refers to combustible liquid fuels made from organic materials that can be burned to replace fossil fuel gasoline in internal combustion engines. While the production of biodiesel differs from the production of oil and gas, the "carbon neutral," and "sustainable" claims of the industry are not accurate.

While the Sierra Club does not oppose the use of used cooking oil, however, when fully taking into account the environmental balance sheet of various forms of biodiesel, the most widely used forms (including ethanol, soy, and palm oil-derived fuels) increase total greenhouse gas emissions during their entire cycle of production and combustion. Vast cultivation of monocultures for crop-based fuels is a severe impediment to the carbon-capturing potential of American farmland. Incentivizing crop-based biodiesel production with tax incentives will incentivize vast cultivation of habitat-destroying monocultures, directly undermining President Biden and Governor Whitmer's commitments to 30x30 conservation goals. Furthermore, using crop-based biofuels exacerbates global deforestation and is a driver of global hunger.

In recent decades scientists have worked to accurately calculate the ecosystem-level impacts of relying on biodiesel, and research shows that the claims made by industry have not lived up to quantifiable reality. This research includes work performed by the California Air Resources Board, showing that full life cycle emissions, including emissions from increased fertilizer application and land use change, are significant, highly uncertain, and can entirely negate the carbon benefit of using crop-based feedstock for biodiesel. In fact, a recent assessment of GHG emissions resulting from corn ethanol production in the U.S. found that total life cycle emissions for corn ethanol exceed those of gasoline.

Supporting the continued use of biofuels has potential costs to the climate, the food system, the environment, and communities living near refineries where it is produced. As our transportation sector continues to decarbonize, we should instead be supporting and incentivizing the most promising technologies aligned with Michigan's long-term vehicle electrification and climate goals. Giving out direct and indirect subsidies for cropbased fuels is an expensive dead-end that does not support investment in scalable electrification technology but rather only drives up food prices and ultimately serves mostly to expand the cultivation of crop based fuel.

We believe there can be a solution here and look forward to continuing the conversation with the bill sponsor to improve the legislation.

Thank you,

2.

Christy McGillivray Legislative and Political Director Sierra Club Michigan Chapter

Deputy Legislative and Political Director Sierra Club Michigan Chapter

Tim Minotas