



# Agricultural Fuels Corp.

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## Public Meeting of the Biomass Research and Development Technical Advisory Committee

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### Public Comment

Nineteen years ago, our facility located in Orlando, FL, began accepting and recycling biogenic materials, specifically wood and wood residuals harvested from the waste stream. We are located at the entrance to the Orange County Landfill, the second largest in the Southeast. We began our business by making landscape materials, such as red mulch. Six years ago, with the passage of the Farm to Fuel Act in Florida, we shifted to only inventorying agricultural fuels. In the future, we intend to provide a market for farmers growing agricultural fuels that we will be able to cost-effectively blend into our existing feedstock.

The following are the main issues for this type of business:

1. - Competing with your regulator, the local government, for market share.  
(e.g. harvesting from the waste stream)
2. - Defining what is an agricultural fuel, versus solid waste. Current law in Florida makes fuels such as - camelina, switch grass, or bagasse indistinguishable from the definition of yard waste.
3. - The high cost of processing equipment.
4. - The high cost of transporting of materials.
5. - The cost of growing and harvesting fuel crops, and the difficulty in finding a buyer who will pay enough for these crops.

We offer the following solutions:

1. - Most states have "Right to Farm" Acts in their statutes. These acts were written to protect farmers from duplicity of local laws, and laws written by local governments that unfairly restrict farmers. The USDA should embrace the idea of harvesting from the waste stream, with the ultimate goal of zero waste. For example, all consumer packaging should ultimately be mandated to be produced from non-fossil fuel, agriculturally produced materials.
2. - Any biogenic material harvested from the waste stream and used as a traditional fuel should be defined as an agricultural product, thereby affording it all of the legal protections of any other farm product. Furthermore, these materials should be entitled to the same incentives as other farm fuels.
3. - Continue to provide grants, incentives, and loan guarantees for innovative and cost-effective equipment that processes and/or utilizes biogenic fuel or biogenic raw materials.
4. - Quit hamstringing the BCAP program, and expand eligible biomass materials to include those harvested from the waste stream, and eligible locations to include state forests and state water management districts.
5. - Encourage the planting of high value crops, the chaff from which can serve as biogenic or agricultural feedstock that can be profitably sold or blended.

Any or all of these changes could have a tremendous impact on the biomass and agricultural fuel industries, and help these renewable energy businesses to grow and thrive.

Sincerely,

James Meade, Chief Technical Officer  
Agricultural Fuels Corp.