



# Agricultural Fuels Corp.

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## BRDI Technical Advisory Committee – Public Comments

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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 near 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 -- which is the local government (owner of the landfill) -- for market share of carbon neutral biogenic materials that are otherwise being wasted. (i.e. – discourages harvesting from the waste stream)
2. - Lack of an unambiguous specific Federal definition of what is a carbon neutral agricultural or biogenic 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 and carbon impact of processing equipment.
4. - The high cost and carbon impact of transporting of materials using fossil fuels.
5. - The cost and carbon impact of growing and harvesting fuel crops using fossil fuel powered equipment, and the difficulty in finding a buyer who will pay enough for these crops.

### **We offer the following solutions:**

1. - Federal agencies, including the EPA and the DOE, should collaborate with USDA to promote the idea of harvesting from the waste stream, with the ultimate goal of zero waste. **All consumer packaging should be incentivized and ultimately mandated to be produced from non-fossil-fuel, agriculturally produced materials.** This action will have many immediate strong and long-term benefits, including dramatically reducing carbon impacts in a significant and sustainable way.
2. - Create an unambiguous, specific Federal definition of what constitutes a carbon neutral agricultural or biogenic fuel, versus solid waste. This definition should further allow the inventory and maintenance of supplies of these carbon neutral materials, as long as proof can be provided that there is no impact to public health or safety.
3. - Any biogenic material harvested from the waste stream, and used as a traditional fuel, should be defined as a carbon neutral agricultural product, thereby affording it all of the legal protections of any other farm product, and providing an avenue for rapid reduction of CO<sub>2</sub> emissions. Furthermore, these materials should be entitled to special incentives, as should other farm fuels.
4. - The EPA, the USDA, and the DOE should coordinate to provide or encourage grants, incentives, and loan guarantees for innovative and cost-effective equipment or transportation that processes and/or utilizes carbon neutral biogenic fuel, or carbon neutral biogenic raw materials, directly or indirectly.
5. - The EPA, the USDA, and the DOE should coordinate to encourage programs, such as the BCAP program, to expand eligible carbon neutral biomass materials to include those “harvested from the waste stream”, and eligible locations to include state forests and state water management districts. This should be accomplished while still being mindful that these materials are likely transported using fossil fuel transportation.
6. - The EPA, the USDA, and the DOE should coordinate to create policy and incentives to promote the planting of high value crops with high-energy-value chaff from which can serve as carbon neutral biogenic or agricultural feedstock that can be profitably sold or blended for fuels.
7. - Encourage and promote reduction and/or elimination of the use of fossil fuels in transportation and processing, including, but not limited to, creating a program for RINs for electric transportation vehicles.

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, while reducing carbon impacts in a significant and meaningful way.

Sincerely,

James Meade, Chief Technical Officer  
Agricultural Fuels Corp.