

Public comment on the Clean Heat Standard bill, H.715
Senate Natural Resources and Energy Committee

Stuart Blood
April 5, 2022
via email

Senators Bray, Westman, MacDonald, Campion and McCormack:

First and foremost, I wish to emphasize that energy conservation, meaning weatherization at scale, must be the priority of a Clean Heat Standard. In addition, I strongly endorse incentives for heat pumps, along with an overhaul of the Renewable Energy Standard to ensure that Vermont's electric supply eliminates greenhouse gas emissions in fact, not just on paper. Both of these initiatives – weatherization and heat pumps – must prioritize the homes of low-income Vermonters.

Next, I ask that you carefully consider the comments regarding life cycle analysis and sustainability certification for biofuels that follow. Life cycle analysis is not a “fix” that will allow only “good” biofuels into Vermont, as the bill's proponents suggest. The LCA modeling that has been proposed is not designed for that purpose. Biofuels must have no role as a clean heat pathway.

Sincerely,
Stuart Blood
Thetford Center

Life cycle analysis (LCA) doesn't fix the problems with biofuels

In March 2022, the EPA held a two-day [Workshop on Biofuel Greenhouse Gas Modeling](#), to which a number of experts were invited to make presentations.

- [Modelers distinguish](#)¹ between *Attributional* LCA (ALCA) and *Consequential* LCA (CLCA).
 - ALCA produces a “carbon intensity” value *for use in a regulation*.
 - CLCA *estimates climate change mitigation* from biofuel programs.
 - Those are different objectives
 - Models designed for one generally don't apply well to the other.
- The [GREET model](#)², specifically mentioned in the CHS bill, is primarily *attributional*.
 - More useful for picking a value for regulators to enforce.
 - Less useful for understanding actual climate effects.
- [Using Attributional Life Cycle Assessment to Estimate Climate-Change Mitigation Benefits Misleads Policy Makers](#)³
 - “... policy makers can be misled by the characterization of attributional LCA (ALCA) results as describing climate-change mitigation potential”
- Policy makers need to [know how to make sense of uncertain results](#)⁴
 - “Decide what range of outcomes is acceptable for policy.”
 - “Evaluate the range of results for a given pathway.”
- The CHS bill assigns policy making to an appointed body with
 - **no guidance** regarding assumptions and inputs;
 - **no guidance** on the range of acceptable outcomes;
 - **no guidance** on how to evaluate the results of a modeled system...

... but with responsibility for achieving “deemed” GHG reductions in 2030 and 2050.

This is wishful thinking.

¹ Plevin, 2022, *Uncertainty in estimating the climate effects of biofuels*, EPA Workshop on Biofuel GHG Modeling

² Wang, 2022, *Biofuel Life-cycle Analysis with the GREET Model*, EPA Workshop on Biofuel GHG Modeling

³ Plevin, et al, 2013, *Using Attributional Life Cycle Assessment to Estimate Climate-Change Mitigation Benefits Misleads Policy Makers*, Journal of Industrial Ecology

⁴ Pavelenko, 2022, *The Role of Modeling Given Uncertainty*, EPA Workshop on Biofuel GHG Modeling

Sustainability certifications are not credible – fraud is common

- Biofuel sustainability standards have not been shown to be an effective tool for avoiding or even reducing the negative impacts of biomass energy on the climate, on forests, on biodiversity and on communities. Until incentives for biomass energy are abolished, there is no credible mechanism that will prevent it from aggravating climate change and speeding up the destruction of forests worldwide.
- Certifying agencies lack relevant expertise, systematically downplay problems that are identified, pay inadequate attention to fraud and misreport information. Those problems may result in part because the certifiers are paid directly by the companies they supposedly audit.
- In the past few years there have been a number of allegations of fraudulent practices in Europe linked to the used cooking oil (UCO) biodiesel industry, including adding palm oil.
- The EU Court of Auditors has said that voluntary schemes cannot guarantee that all the UCO imported into Europe complies with the law.

If the European Union has problems with fraud in its biofuel standard enforcement, how can Vermont effectively enforce compliance?