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June 11, 2020

Andrew Wheeler  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave, N.W.  
Washington, DC 20460

Re: Biogenic CO2 Emissions, Annual Crops

Dear Administrator Wheeler:

It is our understanding that EPA has a proposed rule currently under OMB review that would determine that the combustion of woody biomass is carbon neutral and make corresponding changes to EPA regulations. Farm Bureau supports this and considers it a positive first step towards acknowledging that biogenic emissions are not a net source of greenhouse gas emissions. However, we have concerns that the proposed rule would miss an opportunity to provide the same clarification for an additional category of feedstocks that are just as carbon neutral: annual agricultural crops.

The American Farm Bureau Federation, the country's largest general farm organization with approximately 6 million family members and representing nearly every type of crop and livestock production across all 50 states and Puerto Rico encourages EPA to seek comment on the regulatory treatment of biogenic CO2 from annual agricultural crops. The science is clear that, like woody biomass, annual agricultural crops are not a net source of carbon emissions.

The main difference between woody biomass and annual agricultural crops is that annual crops grow to maturity in a single year—carbon emitted from the processing of annual agricultural crops is therefore replaced rapidly when the next year's crops are grown. The Department of Agriculture, the IPCC, and various researchers have each recognized that the carbon sequestered by growing agricultural crops cancels out or even outweighs the carbon emitted when those crops are processed.

Farm Bureau respectfully urges EPA to request comment to its pending proposed rule on whether to find that biogenic emissions from annual agricultural crops are carbon neutral or a de minimis source of carbon. Including those requests for comment in the proposal would allow the Farm Bureau and other stakeholders to provide EPA with information to help it finalize an action regarding emissions from annual agricultural crops. The last thing farmers should be worried about is future EPA regulation of carbon emissions on their farms especially when the science shows that annual crops are not a net source.

We appreciate your work on these important issues and look forward to working with you to provide certainty for our farmers and ranchers.

Sincerely,

Paul Schlegel  
Vice President, Public Affairs  
American Farm Bureau Federation