Cathy Seitz

Section 2.11 in the Draft Scoping Document states that "Compared with conventional jet fuel, 100% SAF has the potential to reduce GHG emissions by up to 94% on a lifecycle basis, depending on feedstock and technology pathway (DOE 2025)". Considering all inputs, my reading on the subject leads me to believe something quite different. The proposal does not explain how they arrive at this 94% figure. However, I suspect it is because of the idea that biofuels are renewable. So for example soybeans, which are the major fuel in the United States, can be regrown. In theory, a carbon balance.However, if you consider that cropland is in limited supply and how much cropland would be required then you realize that something else would have to give. Possibly forests, possibly food, recreation lands, and so forth.

The principal source of biofuels elsewhere is palm oil. We already have reports of rainforest being cut down and replaced with palm trees for this and other purposes.However, we know that the most important thing to keep not just the climate, but the whole natural environment in balance is to preserve our forests.

Finlay Asher is a former employee of Rolls Royce Airplane engine division. After eight years of this he quit because of his concerns about sustainable aviation fuels and started an organization, the Stay Grounded Network, to inform the public about the problems.

Asher tells us that in order to fuel a jet plane with even the 50% SAF, which is the most they can presently do, such vast amounts of cropland would be required as to make it unfeasible. He also states that there are no technologies which are really sustainable, and that because the damage caused by fossil fuel aviation fuels cannot be improved by so-called sustainable fuels, it is actually very important to focus on reducing the amount of air travel.This of course, he says is opposite to the direction currently being taken. (SG-factsheet-Biofuels-2025.pdf)

There is an organization called BiofuelWatch which researches and reports on the effects of biofuels in general. Here are two articles published on their site outlining their concerns relative to aviation fuels.

(Putting Rainforests into Fuel Tanks? Groups Warn IMO Against Biofuel Disaster – biofuelwatch)

"Increasing biofuel production to meet the demand generated by the IMO would end up removing land essential for food production, in a context of hunger and a lack of any buffer in terms of stocks of basic food products in Brazil and other countries in the Global South," points out Maria Emília Pacheco, advisor to the Brazilian NGO FASE, and former president of the National Council for Food and Nutritional Security (CONSEA).

And (Burning Billions for Biomass – biofuelwatch)

"The effect has been to support the expansion of a biomass industry that is driving deforestation and forest degradation, polluting communities, and releasing more CO2 than the fossil fuels it is intended to replace... carbon markets ignore the emissions from biomass, giving it a free pass...

"Subsidies supporting biomass facilitate the expansion of an industry that undermines urgently

necessary efforts to reduce emissions, pollutes communities and degrades forests and biodiversity."

I am a long time environmentalist, and as such, I note that in our current time, we are at a very crucial juncture in how we handle the environment. There are enormous efforts subsidized by mountains of money, some of which for solutions which don't work. It's vitally important that instead of continuing to be led down the primrose path of these promises, we seriously assess the effectiveness of each solution and cull the ones that won't work. I understand the hesitancy to call for a reduction in flying. However at this point in time, that is the reality that we must face. If the Department of Ecology in Washington state truly wants to do something about the climate or about our dependency on fossil fuels, they need to take this direction. In fact, I see it as their responsibility. Out of all the actors in the situation, in fact, they may be alone in holding this power and should take this responsibility with great seriousness.

Another warning from Foley. That is that in expectation of the fuel problems being resolved, the aviation industry has been expanding. For example, several airports are building new runways. The need is for reduction to be regulated and for information. Be frank with everyone and let them know of the real situation. Of course, you could just let things go on and wait until things get really out of hand. It would be irresponsible, but easier for everyone to see that the whole idea was a mistake to begin with. In the interim, the building of airports and planes, and the planning for people to be able to fly affordably for work or pleasure, could result in a terrible crash when we find out that agencies such as yours should have warned us that we actually did not have sustainable fuel sources.

I'm discussing these challenges at length because I understand that halting progress on biofuels at this point is going to be a challenge. Another point that Foley makes is that most people who fly a lot are the ultra-rich, who generally hold so much power and want things their way. But it's their planet too. I don't think it would be impossible to persuade them to modify their habits. It just needs to become fashionable.

The Dept. of Ecology needs to propose more regulations to reduce the amount of air travel and aviation fuel use. SAFs should not be exempt from this, nor should they be subsidized. They simply are not an improvement over fossil fuels, and would probably make things worse.