



The Minnesota Soybean Growers Association (MSGA) would like to share our severe reservations regarding the Minnesota Pollution Control Agency's proposed Clean Cars Minnesota rulemaking (OAH docket number 71-9003-36416). MSGA is opposed to the State of Minnesota implementing another state's green-house gas reduction goals. MSGA is also opposed to the use of rulemaking to enact this rule without the robust discussions that occur during the robust legislative process. Simply put: There is not room in One Minnesota for California. Minnesota has been a leader in reducing greenhouse gas emissions (GHG) through our own rules and regulations and should remain a leader, not a follower in this arena. Tying Minnesota to the California system and Clean Air Act (CAA) waiver system will result in needless rulemaking in the future.

The MPCA argues that the rule will not impact biofuels, and therefore farm groups should not be concerned about the rule. MSGA disagrees with this assertion. We feel the rule sets Minnesota on a path where electric cars are considered the only answer to GHG reduction goals. California has already announced this intention with proclamations by their governor on goals to stop selling combustion engines. The SONAR cites new rules and standards adopted by the Trump administration as the reason that they need to act to maintain a reduction in GHG emissions. The SONAR ignores and does not address the election of Joe Biden as president and his announcement in January that he will act to reverse the very decisions that MPCA cites as the reason Minnesota must act. The SONAR's own graphics show reductions in transportation and other sectors GHG emissions. The undoing of the Trump administration's actions makes this rulemaking unnecessary.

Unlike California, which has four separate electric car company's world headquarters in their state, Minnesota is not the home of a single electric car company. Minnesota is, however, home to nearly 28,000 soybean farmers and three biodiesel plants. California does not produce anywhere near the amounts of soybeans that Minnesota does. Minnesota has been sued for our efforts in mandating Biodiesel in our fuel supply because of the GHG benefits and preemption by the CAA. This lawsuit was defended by the Minnesota Attorney General who described the Biodiesel Mandate not as a GHG statute, but a rural economic development program with GHG benefits. Minnesota won that lawsuit, and our mandate was upheld. Now MPCA appears to be prepared to work towards efforts that will hurt these economic wins in our state and shift those wins to California car companies.

MSGA is frustrated to see an agency, MPCA, that has been a primary opponent of blends over 20% biodiesel now pass over a proven GHG reduction solution in favor of technologies less proven to help with long term environmental issues. This rule does not account for the problems of where these electric car batteries will end up when they are no longer in service. It does not account for the environmental damage done in the mining industry done for necessary elements of these batteries. MPCA clings to old data on biofuels and ignores huge advances in biofuels production that lowers their carbon footprint.

One of our biodiesel plants ran calculations based on proven methods to illustrate this emissions reduction from the use of biodiesel. Renewable Energy Group found, "Here's how much higher GHG emissions are for other fuel choices, compared to REG B100 (100% biodiesel): 580% higher with petroleum diesel: 435% higher with compressed natural gas; 195% higher with an electric vehicle with natural gas-derived electricity."

Transesterification is the main chemical reaction used to create biodiesel from any vegetable oil or waste cooking oils. This reaction requires energy to drive the reaction. In a traditional transesterification reactor, the feedstock is heated from 70 deg F (on average) to 145 deg F. The amount of natural gas needed to perform this heating on 1M gallons of feedstock is approximately 263,000 cubic feet. This is the process used in the REG plant, which leads to the huge reductions in GHG over other fuel choices in their example.

In comparison, the Plasma Blue technology, created with research dollars from Minnesota's soybean checkoff, greatly reduces the energy used to produce Biodiesel. Plasma Blue's units can make the same 1mMillion gallons of biodiesel with using the same electricity needed to power two 60-watt light bulbs. This amount of power can be easily created from a solar cell the size of a standard dining room table. These gains in reduction of GHG with biodiesel will greatly increase the benefits seen from burning biodiesel in vehicles in Minnesota. MPCA, however, overlooks these potential GHG reduction gains in their SONAR and advances one solution.

This rule is not necessary. The SONAR looks at one solution and does not consider other options. The SONAR fails to address new directions the Biden administration is taken. It fails to look at the impact of more demand on a "dirty" grid will have that may exacerbate climate change. The MPCA has not shown that this rule is reasonable. The SONAR does not describe how the rule and switch to electric cars will have a direct impact on the climate change driven effects Minnesota is feeling. MPCA admits neighboring states are not moving in this direction. With Green House gases not recognizing state borders, there is no proof in the SONAR that Minnesota's actions will help Minnesota other than by meeting arbitrary goals.

Rulemaking is not the forum for these type of changes in State Law. MSGA and the state have directly different opinions on key definitions involved in the California Air Resources Board and their rulemaking. Minnesota fought efforts to attack our Biodiesel mandate and adopted a position that soybean oil is a waste oil and a drag on the soy crush industry in the state. California calls soybean oil a human food product in direct opposition to MN's position. By using the rulemaking process, this rule is not being vetted as thoroughly as it should be and these differences are not being discussed.

MSGA has been advocating for the use of Biodiesel in the state's fuel supply for decades. Biodiesel was the first fuel named an advanced biofuel by the U.S. Environmental Protection Agency based on its ability to GHG by more than 50% compared with petroleum. The agricultural community hasn't rested on our laurels with this level of reduction. The SONAR does not address any of these new technologies as a way to meet our GHG emission goals. They did not consider any other option than to adopt a California electric vehicle mandate. As discussed above, biofuels technologies are advancing and making these fuels more and more beneficial in their GHG reduction. The Biden administration's EPA will surely be on a different trajectory than the Trump administration. California has already announced an intention to change their rule. All of these are very compelling reasons to stop the processes of adopting a rule that will be obsolete in the near future. MSGA opposes the adoption of this rule.



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