



**BEFORE THE
CLEAN AIR ASSOCIATION OF THE NORTHEAST STATES**

**Comments of Biotechnology Industry Organization on
Economic Analysis to Implement the Clean Fuel Standard**

The Biotechnology Industry Organization (“BIO”) is pleased to comment on the Clean Air Association of the Northeast States (“NESCAUM”) Economic Analysis of a Program to Promote Clean Transportation Fuels in the Northeast/Mid-Atlantic Region. BIO is the world’s largest biotechnology organization, with more than 1,100 member companies worldwide. BIO represents leading technology companies in the production of conventional and advanced biofuels and other sustainable solutions to energy and climate change. BIO also represents the leaders in developing new crop technologies for food, feed, fiber, and fuel.

BIO supports NESCAUM’s efforts to reduce the carbon intensity of transportation fuels, and believes that biofuels can and must contribute significantly to this important objective. BIO believes that NESCAUM’s construction of scenarios for various low carbon fuel options (biofuels, electricity and natural gas) is a reasonable approach to consider possible outcomes. The “biofuels future” scenario, which would have 60% of the carbon reduction coming from use of biofuels represents a very plausible scenario, especially considering the substantial investments under way by BIO members on development and commercialization of advanced biofuels, bioproducts and new biomass crops.

BIO firmly believes that a Clean Fuel Standard (“CFS”) can have an enormous impact on regional economic growth in the Northeast. BIO has more than 15 member companies working on biofuels research, development, or production in the Northeast, which will add substantially to the region’s economic output. Many of these investments are bringing high quality jobs in areas where they are sorely needed. Take Solazyme, for example, a BIO member company working on the production of fuels from algae. Solazyme has recently retrofitted a former Merck plant in Danville, PA for use as an algae fuel demonstration plant. This plant alone will create 80 direct and 250 indirect jobs in a county with high unemployment.

BIO encourages the states in the Northeast and Mid-Atlantic to expeditiously move to adopt a regional CFS. In proceeding to rulemaking, it will be critical that rules are approached in ways that (1) follow consistently applied and thoroughly vetted methodology; (2) be based on contemporary and complete data; and (3) account for and encourage a range of future technology advances to ensure continued reductions in the carbon intensity of the region’s fuel mix. BIO looks forward to working with stakeholders in the region to achieve these objectives.

We thank you for your consideration of these comments.