

Treatment of palm oil under the Renewable Fuels Standard; EPA Docket: EPA-HQ-OAR-2011-0542

Contributed by George Landrith
Tuesday, 20 March 2012

Dear Administrator Jackson:

Our organization is dedicated to defending the basic principles of individual freedom and responsibility upon which the nation was founded. We take seriously any erosion of liberty; and we work to protect the endowment of rights owned by all Americans.

To that end, we are dismayed by the EPA's decision to prohibit Americans from exercising their rights in the private marketplace with respect to palm-derived biofuels. This encroachment upon the individual freedoms of citizens and private businesses is unjustifiable and should be withdrawn.

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There is a broader context for this particular concern. Our organization has witnessed a steady and systemic assault by the current administration on the liberties of Americans to make choices with respect to energy consumption.

For example, the administration has blocked the development of the Keystone Pipeline, defying the rights of Americans to develop infrastructure, form capital, and trade as they see fit. The administration has also limited domestic production of conventional energy in Alaska, the intermountain west, and the Gulf of Mexico.

Time and again the administration has played politics with the country's energy supply and security. It has done so in an effort to assuage the concerns of environmental groups and other special interests.

The recent decision on palm oil continues the assault on individual freedom. The policy deprives American energy consumers of a fuller range of choices in the energy market. It privileges certain well-connected domestic producer groups, ultimately raising costs and limiting choices for all Americans.

The EPA should not position itself as the ultimate regulator and gatekeeper of alternative energy sources. It should instead institute policies that permit the entrepreneurial forces of market to respond to consumer demands and to determine the ultimate contours and direction of the energy sector.

The EPA is engaged in an effort to penalize certain kinds of land use in other countries. Foreign entrepreneurs are being told by an American regulatory body what kinds of business activity are legitimate and what kinds of activity are suspect. This is a gross overreach into the affairs of sovereign states.

That this overreach undermines sensible foreign national development strategies compounds the injustice perpetrated against American citizens. It is a hostile affront to long-standing American allies who have invested in plantation agriculture as a means of tapping into export markets to generate economic growth. And it undermines US support for greater global prosperity and poverty abatement.

It's worth highlighting a tragic irony at the heart of the EPA's decision. This administration entered office promising to support greater development, adoption, and utilization of renewable energy. The decision to block the use of palm oil in the US market undercuts that effort.

After all, most renewable fuels struggle to make a dent in the marketplace because they cost more than mature conventional alternatives. Palm oil happens to be the most cost effective biofuel on the market. There is far greater energy yield per hectare from palm oil than any competitor fuel. The EPA's decision undermines the move toward energy diversity the administration claims it wants by penalizing the most competitive biofuel option on the global market.

The EPA's ostensible mandate is to protect the American environment. By blocking a clean foreign biofuel from the US market, the EPA is increasing the likelihood that more costly and less efficient - and thus dirtier -- options will be used in its place. This is the opposite of environmental protection.

During a time of rising energy costs, it's not too late for the EPA to reconsider this imprudent step.

Frontiers of Freedom urges the EPA to liberate the market and open it for all-of-the-above energy supplies.

Sincerely,

George Landrith
President and CEO
Frontiers of Freedom