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To Group A-AND-R-DOCKET@EPA
cc "Erickson, Nancy" <NErickson@ilfb.org>
bcc
Subject Comments on Docket ID No. EPA-HQ-OAR-2008-0318

December 10, 2008

Air and Radiation Docket and Information Center
Environmental Protection Agency
Mailcode: 2822T,
1200 Pennsylvania Ave., N.W.
Washington, DC 20460.

RE: Comments on Docket ID No. EPA-HQ-OAR-2008-0318

Please accept these comments from Illinois Farm Bureau regarding the Advanced Notice for Proposed Rulemaking (ANPR) on possible changes to the Clean Air Act (CAA) regarding greenhouse gases.

We are opposed to regulating greenhouse gas (GHG) emissions under the Clean Air Act. If greenhouse gases are classified as a "pollutant" under the Clean Air Act, other provisions of the CAA could automatically be triggered, creating a much broader regulation of other sectors of the economy, including agriculture.

One such unintended consequence for agriculture could be the fees that may be placed on agricultural operations. Fees (or taxes) on cows and hogs would impose a significant added cost for dairy, beef and hog producers that cannot easily be absorbed. Most farmers will be unable to pass along these costs. Imposition of such costs may cause many farmers to go out of business.

GHG regulation under the Clean Air Act will adversely impact all farmers. Regulation of various aspects of agricultural operations may be extensive and place huge economic burdens on farmers. Regulation of other economic sectors will result in increased fuel, fertilizer and energy costs for all farmers. It will have adverse economic consequences for other sectors of agriculture as well as for all segments of society.

Emissions from cows and hogs are the result of natural and biological processes. There is no known technology to control many of these biological processes.

Unlike other regulated pollutants, GHGs are global in scope and distribute evenly across the world. A ton emitted in one state has the same impact as a ton emitted in other countries. Regulating a ton in the United States without addressing emissions in other countries would do little to address the global issue, and would only penalize producers in the United States.

For sectors of American agriculture vulnerable to foreign imports, the regulations may cause livestock production to increase in other parts of the world to keep up with global demand. American consumers would be purchasing and consuming less domestically-produced product and more foreign-produced product. According to the UN report “Livestock’s Long Shadow,” the U.S. system of livestock production emits less GHG than production anywhere else in the world. U.S. production practices are better able to manage manure and capture methane. Thus, taxing the livestock industry in the United States through regulation as outlined in the ANPR might actually result in more GHG being emitted globally.

We urge the agency to not proceed with the issues outlined in the ANPR. The Clean Air Act is not an appropriate mechanism for regulating greenhouse gases. It could lead to many unintended consequences, including the regulation of agriculture and many other segments of society.

Sincerely,

Nancy Erickson, Director
Natural and Environmental Resources