



## TENNESSEE FARM BUREAU FEDERATION

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March 18, 2025

William Hohenstien  
Director, Office of Energy and Environmental Policy  
United States Department of Agriculture  
1400 Independence Avenue, SW  
Washington, DC 20250

**Re: Docket No. USDA-2024-0003; Technical Guidelines for Climate Smart  
Agriculture Crops Used as Biofuel Feedstocks**

Dear Director Hohenstein:

The Tennessee Farm Bureau Federation (TFBF) appreciates the opportunity to provide comments on the requested information related to procedures for quantification, reporting, and verification of greenhouse gas (GHG) emissions associated with the production of domestic agricultural commodities used as biofuel feedstocks. TFBF is a general farm organization of over 695,000 family members whose purpose is to represent the widely varied commodity producers of Tennessee. Our policy is developed through a grassroots network of farmer members who identify, research, deliberate, vote on, and adopt policies on numerous issues related to agriculture and rural living. On behalf of those farmer members, we encourage the United States Department of Agriculture (USDA) to consider these comments.

Farmers have a deep and long-standing interest in protecting the environment based upon philosophical beliefs and practical self-interest. Land is typically a farmer's largest asset and primary source of income, and they have every incentive to leave this natural resource in better shape for the next generation. Farmers continually strive to balance earning a living from the land while being stewards of the land, air, and water. Increasingly, farmers are asked to produce more using fewer resources, while simultaneously decreasing their GHG emissions footprint. From climate-smart farming practices to voluntary management of forests, grasslands, wetlands, and croplands, farmers are reducing their footprint and actively absorbing carbon from the atmosphere.

It is of utmost importance for the farmers of Tennessee and across the country that USDA ensure the commodities our farmers grow are not only eligible for consideration as feedstocks for biofuels but are the preferred feedstock for domestic biofuel production. USDA must lead across other federal agencies – including the Department

of the Treasury, Environmental Protection Agency, and the Department of Energy – so there is understanding of on-farm practices happening on American farms across the country. The failure of the Department of Treasury’s Clean Fuels Production Tax Credit, or 45z tax credit, to prioritize domestic feedstocks for biofuel production has resulted in exponential increases in imports of used cooking oil and other oils from other countries and leaving American feedstock producers at a disadvantage. USDA must not make this same mistake and should place significant emphasis on domestic feedstock producers and make any guidelines workable and practical for American farmers.

When considering practices to potentially mitigate GHG emissions and/or sequester carbon, USDA must account for the many varied production practices farmers participate in across American agriculture, both geographically and at the farmgate. First, production practices that work in one state may not work in another. Geographical differences across the country both encourage farmers to and prevent farmers from utilizing different production practices. Similarly, farmers make decisions every day about what practices work on specific fields within their own farm. This could be based on factors such as soil type, topography, moisture capacity, disease and pest pressures, and others. USDA must consider these differences and not create a one-size-fits-all approach.

In the rulemaking document under the section titled “USDA Response and Request for Additional Public Comment”, in question 4, USDA mentions consideration of including oilseed crops in the final rule. TFBF acknowledges USDA’s consideration of oilseed crops and the role they can play in reducing GHG impacts. Research at the University of Tennessee Institute of Agriculture<sup>1</sup> (UTIA) shows sustainable aviation fuel made from winter canola is a promising alternative to conventional aviation fuel, presenting the potential to reduce the carbon footprint of aviation fuel by at least 50 percent. Winter oilseed crops are a viable fit into crop rotation schedules for many Tennessee row crop farms. Winter oilseeds contain a high oil content and, depending on the species and chemical composition, allow for use as drop-in fuel. These crops are commonly used as a cash crop for farmers, as they are commonly grown in the off-season for many food crops, providing farmers with both economic benefits as part of a double-cropping system and ecological benefits as a cover crop. We urge USDA to include oilseed crops in the final rule and are happy to connect USDA with more resources about their many benefits.

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<sup>1</sup> Bolakhe, K., Yu, T.E., Sykes, V.R., Smith, S.A., Boyer, C.N. Evaluating a Stochastic Optimized Sustainable Aviation Fuel Supply Chain from Winter Canola and Its Carbon Intensity. Master’s Thesis. (July 2024). *University of Tennessee Institute of Agriculture*.

In question 9, USDA highlights differences in the proposed implementation standards from requirements from other USDA programs (i.e., crop insurance). TFBF is concerned that, if this is the case, farmers will have to choose between participating in managing their risk or adding value to their operation. We strongly encourage USDA to reconsider disparities between this proposal and other farm programs within the Department to allow farmers to not have to choose between beneficial programs.

Finally, USDA must prioritize data privacy for farmers when determining reporting requirements. Reporting identifying information to federal agencies or participants farther down the biofuels supply chain increases the chances of personal data about a farmer and farm location being made public. Since farmers typically live where their place of business is located, business information is also personal information and provides greater risk of eroded privacy. TFBF encourages USDA to brainstorm ways to decrease the number of recipients who receive this personal information about farms.

Biofuels an exciting opportunity for new market development for American row crop producers across the country. We encourage USDA to unlock the ability for American agriculture to be the lead supplier of feedstocks for biofuels. Tennessee farmers have a proven record of utilizing carbon reduction production practices when they understand the environmental benefits and increased profit motive and stand ready to lead in growing feedstocks for domestic biofuel production. TFBF looks forward to working with USDA to create guidelines for biofuel production which simultaneously incentivize environmentally sound practices and support American feedstock producers who work every day to be sound stewards of the land.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Eric Mayberry".

Eric Mayberry

President

Tennessee Farm Bureau Federation