

**Talking Points for Testimony at EPA Public Hearings  
Regarding Proposed “Carbon Pollution Plan” Rule to  
Reduce Greenhouse Gas Emissions from Existing Sources**

1. Introduce yourself with name, title, organization.
2. Description of the organization you are representing and your interest in this rule. IE, how are you using CO2 now? How might you use it in the future?
3. As a member of the Algae Biomass Organization, [YOUR ORGANIZATION NAME] supports the ABO’s efforts to encourage the Environmental Protection Agency (EPA) to include language supporting carbon utilization in the Carbon Pollution Plan final rule.
4. CO2 is an important, expensive input in the process of growing algae which can then be converted into valuable products.
5. For high productivity, algae require more CO2 which can actually be supplied by emissions sources such as power plants and ethanol production facilities.
6. ABO and its members advocate for carbon utilization as an obviously more productive use of CO2 than sequestration. The utilization of CO2 to grow algae will result in innovative, domestically produced products like fuel, feed, fertilizer, food and chemicals.
7. The proposed rule’s silence on CO2 utilization effectively discourages states from including utilization in their state plans, thereby slowing progress in technology development which has great potential for monetizing CO2, reducing atmospheric CO2 in a productive way.
8. Furthermore, the EPA seems to indicate a preference for carbon sequestration or disposal over utilization or reuse by discussing sequestration in the preamble to the propose rule, but not discussing utilization. We see “permanent storage” of CO2 as a euphemism for disposal.
9. The Pollution Prevention Act waste management hierarchy lists waste treatment options in the following order: 1. Prevention or reduction of waste; 2. Recycling; 3. Treatment; 4. Disposal. Disposal is the least preferred option for handling waste under the statute. We encourage the EPA to apply this hierarchy to CO2 and encourage the utilization of CO2 as a preferred method to sequestration.
10. While algae utilization of CO2 is an important method of CO2 reuse, we understand there are other organizations and industries such as the cement and plastics industries which are also developing technologies to convert CO2 into valuable products.
11. We encourage the EPA to include language in the final rule indicating that carbon utilization would be an acceptable component in state emissions reduction plans in order to not slow the development of new technologies which will ultimately result in a market for CO2.