

The Global Food Industry's Public Comment in Support of the Clean Power Plan (CPP)

U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC)
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1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: Danone, Mars, Nestlé & Unilever on the Proposed Repeal of the Clean Power Plan, Docket ID No. EPA-HQ-OAR-2017-0355

The global food system is under pressure like never before. As major food manufacturers we recognize that climate change is bad for farmers, agriculture, business and consumers. Drought, flooding and hotter growing conditions threaten the world's food supply and contribute to food insecurity. The food industry has made a number of commitments to support the global effort to address climate change, but it is clear we need global and national policies that drive the systemic change necessary to reduce greenhouse gas emissions in line with what the science says is necessary. In different ways, each of our businesses has supported the Clean Power Plan and we believe that its repeal would result in policy uncertainty that would be harmful to U.S. businesses and to the country's economy. We write to encourage you to either maintain the Clean Power Plan and its goal to reduce carbon pollution from the power sector by 32 percent by 2030 (from 2005 levels) or find an alternative of equal or greater impact that would ensure that the United States meets our international commitments to reduce greenhouse gases.

How the Global Food Industry is Helping Address Climate Change

In recent years, our global food companies have made a number of commitments to address climate change. Specifically, we are:

- Working to use energy more efficiently in our direct operations and re-energizing our efforts to ensure that our supply chains use energy efficiently too;
- Advancing the use of renewable electricity to power the facilities where we make our products;
- Working to better manage soils so we can further sequester carbon dioxide;
- Reclaiming degraded land to increase food production and improve the lives of farmers;
- Supporting farmers through education and resources for effective use of water and building healthier soils;
- Reducing food loss and waste which reduces emissions, improves incomes and provides more food for all;
- Eliminating deforestation and the land use pressure that drives it;
- Implementing initiatives to decrease our carbon impact through recycled, reduced and renewable packaging;
- Talking transparently about our efforts and sharing best practices; and
- Using our voices to advocate for governments to set clear, science-based, measurable and enforceable targets to reduce greenhouse gas emissions.

The Economic Impact of Regulating Carbon Emissions

In recent years, the U.S. has demonstrated that it is possible to reduce greenhouse gas emissions while maintaining economic growth. The costs of renewables and natural gas are decreasing and energy efficiency is improving. This is good news, but we need clear policy to continue the pace of change that is needed.

If we don't regulate emissions at a level at least commensurate with the Clean Power Plan, we will experience more destructive, unpredictable weather which will put our global food system under more stress while also placing farming communities and livelihoods at risk.

For the United States alone, credible estimates from GAO, FEMA and others are that without action, potential risks to the United States economy are in the trillions of dollar range.

Effective Emission Reduction is Necessary and Feasible

As some of the world's largest food companies, we have the scale to make a difference. We will do our part and we ask that the U.S. government work with us to advance food and climate security. We strongly support the Clean Power Plan and believe it should be left in place or an even stronger alternative identified and enforced. Our businesses are committed to clean energy and we believe its growing use will make the U.S. economy stronger while reducing emissions and increasing resiliency. Any adjustments to U.S. climate policy should continue to support the increased use of renewable energy and yield equal or better greenhouse gas emissions at equal or lower costs. In its role as the steward of environmental issues, the Environmental Protection Agency should encourage the use of all available approaches to reduce greenhouse gas emissions in a cost effective manner.

