

**Statement of Chris Bliley, Senior Vice President of Regulatory Affairs,
Growth Energy
EPA Hearing: Control of Air Pollution from Aircraft Engines: Emission
Standards and Test Procedures
February 17, 2022**

Thank you for the opportunity to appear before you today to discuss the agency's proposed particulate matter (PM) emission standards and test procedures for jet engines. Growth Energy is the largest renewable fuel organization in the world representing 89 of the most innovative biofuel producers and thousands of biofuel supporters. Our diverse membership is energized by this new aviation frontier to help the U.S. meet aggressive climate and pollution reduction goals in the hard to electrify sector.

As the proposal and studies show, there are numerous negative health and environmental impacts from PM emissions from combustion in mobile sources. Low-carbon, plant-based biofuels are among the best and most cost-effective options for reducing both PM and greenhouse gas emissions from the aviation sector.

U.S.-based airlines used more than 18 billion gallons of jet fuel in 2019¹. Accessing the aviation market through ethanol to sustainable aviation fuel (SAF) provides America's ethanol industry the opportunity to be utilized in more than just light-duty cars and trucks.

As we've already seen with higher biofuel blends and light-duty vehicles, the use of sustainable aviation fuel (SAF) holds tremendous potential for reducing air pollution and improving our air quality. Ethanol to jet fuel as SAF has the potential to replace 50% of the petroleum used in jet fuel. And, while discussion of SAF has largely focused on addressing climate-change through reduction of greenhouse gas emissions (GHG), at a 50% blend, SAF can reduce PM emissions by nearly 70%, reduce sulfur by 37%, and provide an 11% decrease in carbon monoxide. These are meaningful reductions that would be a win-win-win for our environment, human health, and for our rural economy.

With the appropriate investment in critical research and development, and the right policy environment, our industry can work to remove these harmful emissions from our aviation fleet. However, to achieve the Biden Administration's goal of 3 billion gallons of SAF production by 2030 and 35 billion gallons by 2050 to achieve net-zero GHG emissions in aviation, we will need game-changing solutions.

¹ "Airline Fuel Cost and Consumption (U.S. Carriers - Scheduled)," Bureau of Transportation Statistics. <https://www.transtats.bts.gov/fuel.asp>.

To make our emission reduction goals a reality, we first need a healthy and thriving biofuel industry to be able to make the long-term investments in research and development.

Specifically, I want to highlight two vital fuel policy considerations alongside this proposal for the agency to consider:

1. A strong and growing Renewable Fuel Standard (RFS): To reach the volumes being discussed, it is critical to have the strong foundation of the RFS.
2. Accurate life-cycle emissions modeling: We strongly support the use of the Department of Energy's Argonne National Laboratory's GREET model which appropriately accounts for innovations in American agriculture and biofuel production.

The biofuel industry stands ready to work with EPA and the Biden Administration to meet our national commitments of aggressive emission reduction goals while supporting economic development, working families, and renewable energy. With forward-leaning policies that support innovation and access to new markets, our industry can provide aviation fuels that will decrease emissions, create more clean energy jobs, and spur economic activity in rural communities today and well into the future.

Thank you for your consideration.