growth energy
America's Ethanol Supporters

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Statement of Chris Bliley, Senior Vice President of Regulatory Affairs, Growth Energy as Prepared for Delivery on May 10, 2023 at EPA's Hearing on the Proposed Rule: Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles

Thank you for the opportunity to appear today to address the agency's proposal for multi-pollutant emissions standards for MY 2027 and later vehicles. My name is Chris Bliley, and I am the Senior Vice President of Regulatory Affairs for Growth Energy. Growth Energy is the world's largest association of biofuel producers. Together, we remain committed to helping our country diversify its energy portfolio in order to grow more green energy jobs, decarbonize our nation's energy mix, sustain family farms, and drive down the costs of transportation fuel for consumers.

Let us be clear—liquid fuels will continue to play a dominant role in the transportation sector now and for decades to come. These fuels and vehicles operate as a system. As such, it is imperative to consider the vital role that environmentally sustainable fuel options, such as ethanol, will play in reducing greenhouse gas emissions from the current and future vehicle fleet, rather than putting the thumb on the scale for one, single technology.

Ethanol is an available and affordable means to immediately clean up our liquid fuel supply. Recent data from EH+E and the Department of Energy's Argonne National Laboratory show today's low-carbon corn ethanol reduces greenhouse gas emissions by nearly 50 percent compared to gasoline and can provide reductions of up to 100% with the use of readily available technologies. Ethanol's other environmental benefits are also noteworthy. As has been researched, the use of more ethanol and ethanol-blended fuel reduces air toxics, such as carbon monoxide, benzene, and other harmful particulates.

With a stable policy and access to drivers, we believe we can deliver low-carbon, low-cost, high-performing, sustainable vehicle fuel solutions that reduce greenhouse gas emissions now and well into the future.

Today, E15 is approved for all 2001 and newer vehicles, more than 96% of today's vehicle fleet. One recent study found that by moving to E15 nationwide, we can immediately reduce greenhouse gas emissions by more than 17 million tons, the equivalent of taking nearly 4 million cars off the road. Also, by using E85 in the millions of flex-fuel vehicles on the road today, even greater reductions in GHG emissions and air toxics can be achieved.

Additionally, it is imperative to consider the benefits of using high-octane, low-carbon fuels to make engines more efficient. Growth Energy has been a leader when it comes to the need for higher octane, midlevel ethanol blends, first submitting a proposal for a 100 RON, E30 fuel more

than a decade ago. The science supporting the benefits of a high-octane, low-carbon, midlevel blend in conjunction with a high-compression ratio engine is not new, and has been well-explored by the national labs, automobile manufacturers, and other scientific institutions.

To achieve these important benefits, we urge the EPA to provide strong and clear policy to encourage the adoption of high octane, low carbon ethanol blends:

1. EPA should take action to encourage the use of blends such as E15 and E85 in today's vehicle fleet.
2. EPA should require a minimum octane standard. Higher octane fuels give automakers greater flexibility to meet the proposed standards.
3. EPA should approve a high octane, midlevel ethanol fuel for vehicle certification such as the 100 RON, E30 that Growth Energy first proposed.
4. EPA and NHTSA should work together to re-establish credits for the production of flex-fuel vehicles.
5. EPA should complete and finalize strong volumes for the RFS for 2023, 2024, 2025, and well into the future to encourage the use of low-carbon biofuels.
6. Finally, we greatly appreciate EPA's emergency RVP waiver for E15 this summer and would reiterate the call to continue to work on a solution RVP for all ethanol blends above 10 percent. It makes little sense why low-carbon biofuel blends should be restricted from the market for 3 months out of the year.

Thank you for your consideration and we look forward to working with you on meaningful fuel solutions to achieve meaningful improvement in air quality.