

Statement of Chris Bliley, Senior Vice President of Regulatory Affairs, Growth Energy on the U.S. Environmental Protection Agency's (EPA) Science Advisory Board's (SAB) Draft Commentary on the Volume Requirements for 2023 and Beyond under the Renewable Fuel Standard

September 21, 2023

[As prepared for delivery]

Thank you for the opportunity to appear today to address the SAB's draft commentary on the volume requirements for 2023 and beyond under the Renewable Fuel Standard (RFS). 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 decarbonize our nation's energy mix, grow American jobs, sustain family farms, and drive down the costs of transportation fuel for consumers.

Ethanol has and will continue to play a major role in decarbonizing and cleaning up emissions from our transportation sector.

Unfortunately, I'm here today to directly refute this flawed commentary that cherry-picks certain data from a few anti-ethanol critics to remarkably claim that there are "minimal or no climate benefits from substituting corn ethanol for gasoline or diesel". Meanwhile years of peer-reviewed research from scientists at the U.S. Department of Energy's Argonne National Lab, the U.S. Department of Agriculture, and Environmental Health and Engineering have all concluded that today's ethanol reduces greenhouse gas emissions by nearly 50% compared to gasoline. Studies claiming otherwise consistently ignore hard data in favor of questionable assumptions and outdated projections about land use.

Specifically, the commentary points to a minority of studies that have used flawed land use change estimates in EPA's regulatory impact analysis that fall outside of the boundary of meeting EPA's GHG reduction requirement to somehow claim that ethanol does not have climate benefits. Meanwhile the commentary fails to note that the majority (13) of the studies reviewed do meet EPA's required GHG emissions reduction threshold. Similarly, the commentary seems to suggest that that the lowest value for ethanol's carbon intensity found by Scully is somehow an outlier, while the commentary takes the highest carbon intensity found by Lark and suggests it is settled science. Additionally, Lark is somehow given more credence because it is more recent by a matter of mere months. When it comes to Lark, here are just a couple quotes from several scientists debunking his assumptions:

"The Lark et al. modeling approach . . . missed the long-run pattern of changes in the mix of crops and the combined effect across all crops produced in the U.S."

"The Lark et al. modeling approach is too limited to effectively consider the drivers of the ethanol industry and its interaction with other industries including the cropping and livestock industries."

“To estimate probability of land transformation, Lark et al. used outdated and inaccurate projections for future crop prices and several other variables.”

Finally, the scientists at Argonne National Laboratory have done the most extensive work on lifecycle greenhouse gas emissions of biofuels through their GREET model, yet neither Argonne nor GREET are mentioned once in this commentary.

The rfs has and continues to be one of our most effective climate policies and we urge you to withdraw, and we strongly urge you to withdraw this draft commentary. At a minimum, if the board wishes to do more extensive research on this topic, it should include more biofuel experts in the workgroup and offer a more robust opportunity for stakeholder and scientific input.

Additionally, we would like to support the comments of Dr. Macintosh of Environmental Health and Engineering and submit several studies that we included in our most recent RFS comments to EPA. Thank you for your consideration.