

June 10, 2021

Department for Transport  
Great Minster House  
33 Horseferry Road  
London  
SW1P 4DR  
United Kingdom

Attn: Parliamentary Under Secretary of State  
Rachel Maclean MP

Re: Comment on amendments to Motor Fuel (Composition and Content) (MFCC)  
Regulations requiring the introduction of E10

Dear Ms. Maclean,

The Renewable Fuels Association (RFA) appreciates the opportunity to provide additional comments in response to the amendments of the Motor Fuel (Composition and Content) Regulations 1999 to require the introduction of E10 petrol at filling stations.

Founded in 1981, RFA is the leading national trade association representing the United States fuel ethanol industry, serving as the premier forum for industry leaders and supporters to discuss ethanol policy, regulation, and technical issues. RFA's 300-plus members produce billions of gallons of renewable fuel and millions of tons of valuable co-products each year and are working to help our world become cleaner, safer, more energy secure, and more economically vibrant.

The renewable fuels industry has been a leader in the global effort to transition away from fossil fuels, and renewable fuels like ethanol have already prevented hundreds of millions of tons of greenhouse gas (GHG) emissions from entering the atmosphere.

We are pleased the United Kingdom is adopting E10 petrol as the standard 95-octane petrol grade, and we agree with the Department of Transport's finding that a move to E10 will reduce greenhouse gas emissions from the existing vehicle fleet. Ethanol is a low-carbon, low-cost fuel that can serve as a gateway to a cleaner future replacing fossil-based liquid fuels. E10 introduction will also help support UK farmers by adding value to local farm commodities.

However, we continue to believe the amendments should be adjusted to increase the required minimum ethanol content for "E10 petrol." To better harmonize with other existing standards, specifications, and norms around the world, we recommend adjusting the minimum ethanol content specified in regulation 3(8) from the current 5.5% by volume to 9.0% by volume. Allowing petrol with as a little as 5.5% ethanol to be characterized as E10 could cause consumer confusion and undermine the Department of Transport's GHG reduction goals. The draft amendment would potentially allow refiners and blenders to meet the "E10" petrol

requirement with a fuel that contains only 0.5% more ethanol than the current E5 grade, while increasing their use of toxic aromatics and other hydrocarbons to achieve the 95 RON octane minimum.

While we understand the U.K. government's desire to provide "maximum flexibility" to fuel suppliers, we believe a higher minimum ethanol content is necessary to ensure the U.K. fully reaps the benefits of a transition to higher ethanol content. We also understand that the potential insufficiency of domestic ethanol supplies has been highlighted by some fuel suppliers as justification for adopting a 5.5% minimum. However, as fuel ethanol is a globally traded commodity, the availability of ethanol imports could help justify a higher minimum ethanol content of 9.0%. Any temporary and transitory shortfalls in U.K. ethanol supplies could be offset by imported volumes, ensuring the U.K. gets the maximum environmental and climate benefits out of its move to E10.

RFA appreciates the opportunity to provide input and we appreciate your efforts to grow the world market for cleaner, greener low-carbon fuels. Moving to E10 as the standard petrol grade will help the U.K. begin to decarbonize its transportation fuels and tackle climate change.

Sincerely,

Kelly Davis  
Vice President of Regulatory Affairs