

**RFA Testimony to the EPA Virtual Public Hearing on the Proposed
Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and
Medium-Duty Vehicles**

Docket EPA-HQ-OAR-2022-0829

May 9, 2023

My name is Geoff Cooper, and I am CEO of the Renewable Fuels Association, the leading trade association for U.S. ethanol producers. We appreciate the opportunity to comment on EPA's proposed multi-pollutant emissions standards for model year 2027 and later vehicles.

RFA shares the Biden administration's goals of increasing vehicle efficiency and reducing carbon emissions. That's why two years ago RFA's member companies committed to achieving a net-zero carbon footprint for ethanol by 2050 or sooner.¹

However, we strongly disagree with regulatory approaches that arbitrarily pick technology winners and losers. Unfortunately, that's exactly what this proposed rule would do. EPA's proposal would effectively force automakers to produce more battery electric vehicles and would strongly discourage them from pursuing other technologies that could achieve the same—or even better—environmental performance at a lower cost to American consumers.

The Agency is putting its thumb on the scale by allowing EV manufacturers to use a zero grams/mile compliance value for EVs. This approach falsely assumes EVs have no carbon impacts whatsoever and ignores the upstream emissions related to electricity generation, as well as the substantial emissions involved in battery mineral extraction and vehicle construction. We strongly oppose EPA's proposal to exclude upstream emissions in the GHG accounting.

If our nation is to reach its goal of net-zero GHG emissions by mid-century, we'll need cleaner, more efficient cars AND cleaner, more efficient fuels. And, we'll need to account for their emissions honestly using a full lifecycle approach. EPA needs to stop pretending that upstream emissions don't matter.

As this administration's own research shows, high-octane, low-carbon renewable fuels like ethanol can immediately deliver dramatic improvements in fuel efficiency and carbon performance when paired with the right engine technologies. Flex fuel vehicles offer a significant opportunity to reduce emissions when running on E85 and other ethanol flex fuels. In addition, high-compression-ratio engines that run on higher-octane fuels can deliver substantial fuel efficiency gains and emissions reductions without requiring massive investments in power generation and transmission infrastructure, exposing America to dependence on China and other

¹ Letter from RFA Member Companies to President Joe Biden. July 27, 2021. <https://ethanolrfa.org/wp-content/uploads/2021/07/RFA-Net-Zero-Commitment-Letter-to-President-Biden-.pdf>

nations for critical minerals, and potentially unleashing other unintended environmental and economic consequences.

We urge EPA to reconsider its proposal and instead adopt a technology-neutral approach that treats all low-carbon transportation options fairly and equally, and we ask that EPA use this rulemaking to establish a roadmap for increasing the required minimum octane rating of our nation's light-duty vehicle fuel.

Thank you.