

Statement of Emily Skor, CEO, Growth Energy
Hearing on Proposed Renewable Fuel Standards for 2020, 2021, and 2022
January 4, 2022

My name is Emily Skor, I am the CEO of Growth Energy, the largest renewable fuel association in the country, representing 92 ethanol producers and 95 businesses in the ethanol value chain.

The Renewable Fuel Standard continues to be one of our nation's most successful transportation decarbonization policies. And we are pleased the administration's stated intent is to get the RFS back on track as a means to further reduce greenhouse gas emissions and decrease our dependence on foreign oil.

EPA's proposal includes a number of forward-looking actions that underscore the critical role biofuels play in decarbonizing the transportation sector -- and with the added benefit of lowering prices at the pump.

During the previous administration, the small refinery exemption program undercut the goals of the RFS, preventing EPA from ensuring the RVO was met each year. We appreciate the agency's work to end this abuse and return to a true implied conventional volume of 15 billion gallons in 2022, along with promoting strong growth in advanced biofuels. We are also pleased that the agency has finally proposed to restore the first 250 million gallons illegally waived in the 2016 RVO with a commitment on the second 250 million gallons for 2023.

EPA's proposal, however, has some serious flaws that need to be addressed. It sets an extremely troubling precedent of revising finalized volumes for 2020 and back-setting volumes for 2021 rather than driving growth in renewable fuels. The proposed retroactive cuts to 2020 exceed EPA's legal authority, and negatively impact the entire agriculture and fuel supply chains.

EPA should return integrity to the RFS program and remove hurdles to the use of higher biofuel blends as follows:

First, leave 2020 RVOs as finalized in 2019, set the conventional 2021 and 2022 RVOs in line with the statute, and finalize the rulemaking as expeditiously as possible.

Next, EPA should move quickly to finalize its proposed denial of pending small refinery exemptions.

Above and beyond the proposed rulemaking, there is more to be done to ensure the RFS works as intended. With more than 96 percent of the vehicle fleet approved for E15, the agency should support efforts to restore year-round access and finalize its proposal to simplify the onerous labeling requirement.

EPA should also move to approve pending registrations for the production of cellulosic biofuel from kernel fiber.

Finally, EPA should update its lifecycle greenhouse gas emissions modeling to reflect ethanol's substantial improvements in greenhouse gas reduction and should set forward-leaning and robust biofuel targets for 2023 and beyond.

The Biden Administration simply cannot meet its climate goals without strong blending requirements for low-carbon biofuel. But if the administration enforces the RFS as promised, it can be a powerful tool for keeping America on the path to a net-zero emission future.

Thank you.