

EPA Public Hearing
RFS Proposed Volume Standards for 2020, 2021 and 2022
Chris Edgington, President, National Corn Growers Association

Thank you for the opportunity to testify on behalf of America's corn farmers, who produce sustainable feedstocks for ethanol. I'm Chris Edgington, a farmer from St. Ansgar, Iowa, and President of the National Corn Growers Association.

Corn farmers support a robust Renewable Fuel Standard. Timely implementation of meaningful RFS volumes provides certainty in agriculture markets, reduces emissions, and lowers fuel prices

For our family's multi-generational farm, the RFS supported the opportunity for my son and niece to return to our operation and farm alongside my brother, my father and me. Nearly all the corn our family farm produces goes into ethanol and its co-products.

EPA's proposal offers the promise of renewable fuel growth in 2022 and repairs RFS integrity through denial of abusive waivers and a response to the Court's 2017 remand. These actions would move the RFS forward, putting more clean fuels in the market to deliver immediate GHG and tailpipe emission reductions.

EPA must finalize the 2022 volumes and deny SREs as proposed, as soon as possible, to fulfill these commitments.

Growth in renewable fuel blending also relies on assurance that volumes set won't be undercut by retroactive waivers or reconsiderations, missed deadlines and extensions. The RFS is based on confidence that EPA will enforce the volumes it sets.

EPA's proposal to reconsider 2020 volumes undercuts the strong 2022 proposal, rewarding the use of more oil in place of clean renewables like ethanol. RFS obligations already self-adjust for declines in fuel consumption, as occurred in 2020. Even if EPA believes additional correction is needed, the 2020 and 2021 proposals cut far beyond actual numbers.

Corn farmers produce low carbon feedstock for low carbon ethanol, offering immediate and affordable emissions reductions and a vital pathway for agriculture to help address climate change. But our success helping you meet these commitments depends on EPA sending a clear and firm message that volume requirements will be enforced.

We ask EPA to quickly finalize the 2022 volumes and SRE denials to expand the role of biofuels in our clean energy future. Second, we ask EPA to rely on the automatic adjustment in percentage standards that occurred in 2020 and avoid the precedent of reopening final volumes. Finally, we urge EPA to respect actual fuel production numbers for 2020 and 2021.

As EPA finalizes and enforces the delayed 2022 RFS volumes and puts the RFS on track, we ask you to work with us to achieve greater emission reductions and cleaner air through use of more renewable, sustainable, affordable ethanol.