



EPA Public Hearing Testimony
Proposed Multi-Pollutant Emission Standards for MY2027-2032 Light Duty Vehicles
Chris Edgington, NCGA Chairman
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I'm Chris Edgington, Chairman of the National Corn Growers Association. Thank you for the opportunity to testify on behalf of NCGA's 40,000 members and the 300,000 farmers who contribute to corn promotion programs in their states.

I am part of a multi-generational family farm in northeast Iowa, where I farm with my brother, father, son and niece. As sustainable producers of the primary feedstock for low-carbon ethanol, farmers are part of the solution to cut both carbon and tailpipe emissions.

Today's ethanol cuts greenhouse gas emissions in half compared to gasoline. Ethanol also replaces harmful aromatics to cut tailpipe emissions.

We share EPA's emission reduction goals. However, EPA's proposed multi-pollutant rule envisions only one solution: electric vehicles. EPA's proposal limits the ability of clean, low-carbon ethanol to contribute greater emission reductions and support affordable options.

Rather than endorse a single technology, we urge EPA to focus on outcomes and open pathways for all low-carbon fuels and technologies. Vehicle standards should enable a level playing field.

Standards should allow consumers to access a wide range of cleaner and cost-effective vehicle and fuel choices, including flex-fuel vehicles and future mid-level blends. Because EPA does not account for full lifecycle emissions of electric vehicles, the proposal does not consider the added greenhouse gas emissions from electricity generation, mineral and battery production and other high-carbon sources.

Even with our strong concerns, we appreciate the request for input on fuel standards to help address emissions from the existing fleet and new vehicles that will be on the road for years to come. We urge EPA to set a clean, high-octane fuel standard that takes advantage of higher ethanol blends to enable automakers to deploy advanced engine technologies.

Clean, high-octane fuel from mid-level ethanol blends, used as a system with advanced engines, offers an essential pathway for achieving significant greenhouse gas and complementary criteria emission reductions from model year 2027 and later vehicles. It also offers substantial public health and environmental justice benefits by reducing particulate matter emissions from gasoline.

EPA's proposal fails to consider all solutions to meet stricter vehicle standards. We urge EPA to address the serious limitations of this proposal and work with us to level the playing field and advance the needed rulemaking to improve fuel standards.

Thank you.