Oral Testimony of Alex Rindler

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before the

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on

2014 Standards for the Renewable Fuel Standard Program

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EPA's proposed rule recognizes that the Renewable Fuel Standard isn't working as designed and that action must be taken to address the ethanol blend wall.

The Environmental Working Group strongly supports a federal mandate that drives the development of low-carbon biofuels that do not pit energy and food security needs against the environment and public health.

But as long as the RFS remains a *de facto* mandate for corn ethanol, these low-carbon, second-generation biofuels will not have a viable market in which they can compete.

That is why EPA should place more emphasis on cellulosic ethanol and drop-in biofuels and de-emphasize corn ethanol, which has proved to be disastrous for the environment.

The proposed 2014 standards lower the overall mandate enough to stave off the blend wall, but this reduction will do little to weaken corn ethanol's chokehold on the market, and it won't help the cellulosic ethanol industry gain a foothold in the E-10 pool.

The more we learn of corn ethanol's harm to the environment, the more difficult it is to justify a renewable fuels policy that mandates its use.

Since Congress expanded the RFS in 2007, we've witnessed a dramatic increase in the demand for – and production of – corn to burn for fuel. The hope that corn ethanol could greatly lower the carbon footprint of the transportation sector died as it became clear that its growth carried a heavy price.

The yardstick we now use to measure corn ethanol's impact is not the gallons of foreign oil it supposedly replaces; it is the acres of wetlands and grasslands that have been plowed under to plant corn.

EWG's analysis of the USDA's Cropland Data Layer found that from 2008 to 2011, the corn ethanol mandate contributed to the loss of 23 million acres of vegetation – an area the size of Indiana.[1]

In places where the loss of wetlands has been greatest, namely the wildlife-rich Prairie Pothole region of the Upper Midwest, corn accounts for most of this conversion – 68 percent, or more than 236,000 acres.[2]

In addition, the rapid conversion of wetlands and grasslands has driven up greenhouse gas emissions by releasing huge amounts of carbon stored in the soil and increasing the use of fertilizers that emit nitrous oxide.

EPA's own lifecycle analysis found that corn ethanol produced more greenhouse gas emissions than gasoline in 2012 – and will continue to do so in 2017.[3]

According to your analysis, corn ethanol produced in a natural gas-fired dry mill plant results in emissions that are 33 percent higher than gasoline's – and 66 percent higher when the ethanol comes from a coal-fired dry mill plant.[4]

Even though corn ethanol contributes to climate change, virtually all corn ethanol production is exempted from the greenhouse gas reduction standards of the RFS – standards that second-generation biofuels like cellulosic ethanol must meet.

With that kind of uneven playing field, it is no wonder that corn ethanol continues to dominate the market at the expense of better biofuels.

Corn ethanol also increases emissions of harmful air pollutants, including particulate matter that contributes to respiratory illnesses. The National Academy of Sciences concluded in 2011 that the effects of ethanol fuel on air quality would be more damaging to human health than those from gasoline use.[5]

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[1] EWG, (2012) Plowed Under. http://static.ewg.org/pdf/plowed_under.pdf.
[2] EWG (2013) Going Going Gone. http://static.ewg.org/pdf/going_gone_cropland_hotspots_final.pdf
[3] See Docket No. EPA-HQ-OAR-2005-0161-3173.5
[4] *Ibid*
[5] National Academy of Sciences (2011), *Renewable Fuel Standard: Potential Economic and Environmental Effects of US Biofuels Policy*, at 246. [Hereinafter NAS].

Even worse, as the acreage dedicated to corn production has increased in recent years, more nitrogen from fertilizer has washed off farm fields, polluting waterways and contributing to low-oxygen "dead zones" lethal to aquatic life. The National Academy also highlighted these harmful effects on water quality, noting that the increase in corn production contributes to both hypoxia and harmful algal blooms.[6]

The verdict is in: The RFS isn't generating environmental benefits because it relies on a fuel that increases greenhouse gas emissions, worsens air and water pollution and scars America's landscape. And this grim reality comes at the expense of cellulosic ethanol producers at the very time their first commercial gallons enter the marketplace.

Unfortunately, federal law limits EPA's ability to address the long-term flaws of the RFS and provide the cellulosic ethanol industry the certainty it needs to succeed. We therefore hope EPA will support congressional efforts to reform federal biofuels policy in order to restore the agency's ability to advance the innovative low-carbon fuels of the future.

[6] NAS at 10.