

United States Senate

WASHINGTON, DC 20510

June 25, 2019

The Honorable Andrew Wheeler
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

Dear Administrator Wheeler:

In early April, the Office of the Chief Economist at the U.S. Department of Agriculture (USDA) released its peer-reviewed findings that the greenhouse gas (GHG) emissions of corn ethanol are 39 percent lower than gasoline vehicle fuel and perhaps as much as 43 percent lower depending on the refining technology. This summarized report is based on a 2017 USDA comprehensive analysis that highlights the significant reductions in emissions that have come from innovations in feedstock production as well as refining processes. It raises the question as to why the U.S. Environmental Protection Agency (EPA) still has not revised its assessment for corn ethanol since 2010, which only shows about a 20 percent reduction for conventional, starch-based ethanol.

We are writing to request that EPA publicly announce its intent to review and incorporate the latest GREET modeling into an updated life cycle assessment for corn ethanol and to announce a timeline by which this will be completed. It need not require further delay or arduous analysis; this is only a matter of EPA formally adopting these changes. If there are valid reasons that this cannot be done in a timely fashion, then we request that the EPA remove the obsolete information from its website and replace it in the interim with the rigorous federal-level analysis published by USDA.

Nearly thirty years ago, top scientists at the U.S. Department of Energy (DoE) Argonne National Laboratory developed the “Greenhouse gas and Regulated Emissions and Energy Use in Transportation (GREET)” model which incorporates more than 100 fuel production pathways and 85 vehicle systems to measure the lifecycle GHG of vehicle fuels. The model is used now by more than 30,000 professional organizations worldwide, from federal agencies such as the Federal Aviation Administration and the National Aeronautics and Space Administration, to domestic companies like Ford and General Motors, and international corporations like BP and PetroChina.

Meanwhile, the EPA stands alone, its decade-old calculation having major implications for opening up new global markets for American ethanol. For example, until recently, Japan, which imports 99 percent of its ethanol, met those needs with Brazilian production based on Brazil's low carbon intensity and their belief that U.S. corn ethanol did not meet their criteria for carbon intensity relative to gasoline. Not until great effort was expended by the U.S. Grains Council in Japan to overcome the conflicting information generated by the outdated EPA model was the Japanese Ministry of Economy, Trade and Industry (METI) persuaded that the latest science verifies U.S. ethanol is suitable for addressing Japan's GHG reduction goals—creating new market opportunities for our farmers.

This not an isolated case. During the past five years, ethanol has been the fastest growing agricultural export: as more nations adopt policies for lower-emission vehicle fuels, domestically produced ethanol can provide an immediate solution for their goals. Moreover, serving these premium markets not only benefits U.S. corn farmers and biofuel producers, which generates more investment in the rural economy, but also encourages greener feedstock production on the farm, such as increased cover crops, reduced nitrogen applications, improved tilling practices, and other conservation benefits that address the water quality priorities outlined by EPA. All of these advancements, however, are thwarted by EPA's old ethanol science, which is disappointing given that other nations look to EPA for technical information regarding GHG emissions on U.S. corn ethanol.

In the March 26, 2010, preamble to Renewable Fuels Standard implementing regulation, EPA committed to updating the GHG assessment for ethanol, affirmed that the science evolves, and pledged to incorporate the updated information into a new assessment. The time has arrived to compete this responsibility.

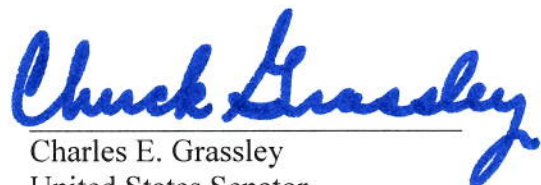
The U.S. Department of Commerce recently announced that farm income has dropped the most in three years, with international trade as a contributing factor. All indications are that farm income will remain tight, if not negative, for the remainder of the year. We assert that there is little justification for EPA to maintain such an outdated calculation that otherwise could be easily corrected with existing, available analysis—and straightforwardly address an unnecessary obstacle to international trade.

We urge that this EPA ethanol modeling be updated without further delay, and we thank you for your attention to this request.

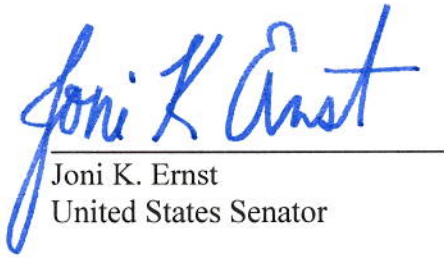
Sincerely,



Richard J. Durbin
United States Senator



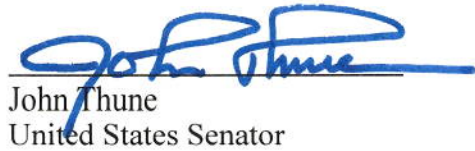
Charles E. Grassley
United States Senator



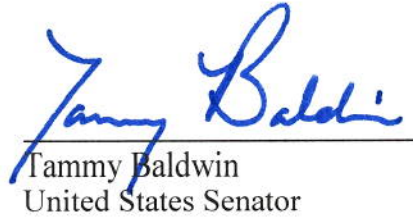
Joni K. Ernst
United States Senator



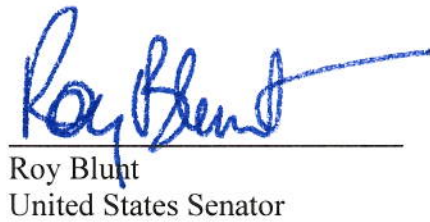
Tina Smith
United States Senator



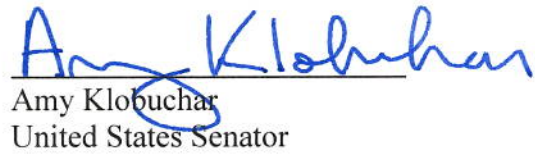
John Thune
United States Senator



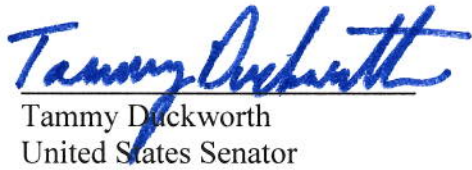
Tammy Baldwin
United States Senator



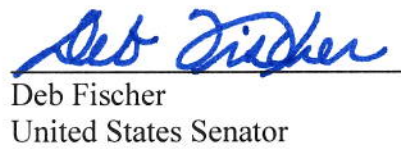
Roy Blunt
United States Senator



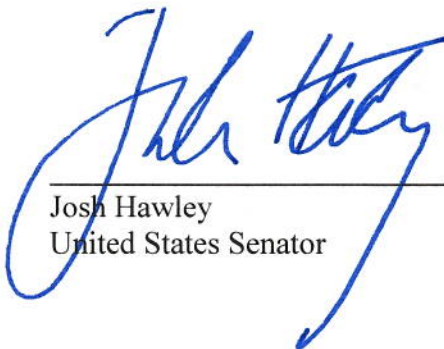
Amy Klobuchar
United States Senator



Tammy Duckworth
United States Senator



Deb Fischer
United States Senator



Josh Hawley
United States Senator