

NCGA President's Remarks During EPA Hearing on RFS

January 10, 2023

I'm Tom Haag, President of the National Corn Growers Association.

Thank you for the opportunity to testify on behalf of NCGA's 40,000 dues-paying farmers and the 300,000 farmers who contribute to corn promotion programs in their states.

A fourth-generation family farmer, I grow more than 1,700 acres of corn and soybeans in south-central Minnesota with my son.

In the face of high fuel prices and global uncertainties, the purposes of the RFS have renewed relevance today. Those purposes include:

- Expanding the fuel supply
- Improving energy security
- Lowering prices
- And cutting emissions

As producers of the feedstock for low carbon ethanol, corn farmers contribute to the success of the RFS through higher corn yields and enhanced sustainability. By producing more corn with less land and

fewer resources, farmers cut the carbon intensity of ethanol while we meet food, feed, export and fuel needs.

As EPA opens a new phase of the RFS, NCGA is pleased with EPA's forward-looking proposal of annual increases in renewable fuel volumes. This proposal includes an implied conventional biofuel volume of 15.25 billion gallons. We appreciate EPA's recognition that renewable fuels like ethanol play a critical role in cutting GHG emissions and improving energy security.

We support the growth trajectory in EPA's proposal. However, with continued pressure on energy security and costs, and the need to accelerate carbon emission reductions, biofuels can contribute even more. We ask EPA to continue working with us on complementary policies that advance higher ethanol blends, enabling ethanol to do more to cut both emissions and costs.

Behind the promising volumes, corn growers also urge EPA to adopt the U.S. Department of Energy's Argonne National Lab GREET model for lifecycle GHG assessment. EPA acknowledges that its 2010 modeling framework is old and requires updating. Yet instead of adopting the federal government's most robust and updated analysis, EPA used outdated estimates and proposed more reviews.

Today's ethanol cuts GHG emissions by 50 percent compared to gasoline.

In addition, we continue to review EPA's proposal for generating RFS credits from biomass electricity. We are focused on ensuring consistency with RFS crediting for other energy sources, transparency and technology neutrality.

Corn growers are proud to supply low carbon feedstocks for low-cost, low-emission ethanol. We stand ready to work with EPA to build on the growing biofuel volumes proposed to continue to make the RFS an energy, environmental and economic success.

Thank you.