

**COMMENTS OF GEOFF COOPER
PRESIDENT AND CHIEF EXECUTIVE OFFICER
RENEWABLE FUELS ASSOCIATION**

**U.S. ENVIRONMENTAL PROTECTION AGENCY
PUBLIC MEETING OF THE SCIENCE ADVISORY BOARD**

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Good morning. My name is Geoff Cooper, and I am CEO of the Renewable Fuels Association. Thank you for the opportunity to share our concerns regarding the SAB's recent commentary on the climate impacts of the Renewable Fuel Standard and corn-based ethanol.

We adamantly disagree with the SAB's assertion that "the best available science" suggests there are "minimal climate benefits" associated with using corn ethanol in place of gasoline. Indeed, the best available science shows just the opposite. Extensive research conducted by government laboratories, major universities, state and federal agencies, NGOs, and private lifecycle analysis experts all demonstrate that corn ethanol is 40-50 percent less carbon intensive than petroleum on a full lifecycle basis—including emissions from hypothetical land use change scenarios.

Over the past several decades, the Department of Energy's Argonne National Laboratory has done more research on corn ethanol's carbon impacts than any other entity in the world. And Argonne's latest work found that average corn ethanol reduces GHG emissions by 44 percent compared to gasoline. The Argonne researchers characterized corn ethanol's carbon savings as "significant" and noted that corn ethanol "...can play a critical role in the U.S. desire for deep decarbonization of its economy." Curiously, the SAB commentary does not include a single acknowledgement or mention of Argonne's comprehensive research quantifying the GHG impacts of corn ethanol.

The SAB asserts that the disagreement over the climate benefits of corn ethanol has to do with whether "cropland has expanded to grow corn for ethanol in the United States as a result of the RFS..." The commentary suggests that "[t]hese facts are difficult to pin down."

But these facts are readily available and easy to interpret. In 2010, EPA began quantifying U.S. agricultural cropland every year to determine whether any expansion has occurred beyond 2007 levels as a result of the RFS. EPA's assessments clearly show a steep downward trend in the amount of land dedicated to crops since 2007. U.S. cropland continues to shrink—not expand. This fact is incontrovertible.

While there has been a slight increase in corn acres in recent decades, those additional corn acres have come from land that was previously planted to other crops (like wheat, cotton, hay, or oats). Those crops have experienced lower global demand and productivity improvements—thus requiring less land for cultivation. These facts are not “difficult to pin down.”

We encourage the SAB to supplement its commentary after conducting a much more expansive and inclusive examination of the science on corn ethanol’s carbon footprint. Specifically, the SAB should consider recent lifecycle analyses from DOE, USDA, state air agencies, academia, and other sources to evaluate what is really happening in today’s corn ethanol industry.

Thank you.