



**Testimony of Brian Jennings**  
**On behalf of the American Coalition for Ethanol (ACE)**  
**For**  
**EPA Public Hearing for Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles**

**May 9, 2023**

Thank you for the opportunity to testify. My name is Brian Jennings, and I am the CEO of the American Coalition for Ethanol (ACE).

We share EPA's desire to significantly reduce greenhouse gas (GHG) emissions from U.S. passenger vehicles, but believe there is a better way than arbitrarily regulating a solution with considerable unknowns.

For example, since 99 percent of U.S. vehicles have internal combustion engines, EPA should give much more consideration to replacing the fossil fuel powering them with a lower carbon and higher-octane alternative, such as ethanol. You don't need to take my word for it, President Biden himself has said we "simply cannot get to net-zero [emissions] by 2050 without biofuels."<sup>1</sup>

Likewise, scientists indicate agriculture is critical to reduce GHG emissions. In 2018, the Intergovernmental Panel on Climate Change (IPCC) found that 89 percent of the globe's capacity to mitigate carbon emissions comes from agricultural soil carbon sequestration.<sup>2</sup> Understanding this enormous potential, ACE is leading a project to more accurately validate the degree to which farmer adoption of practices, such as reduced tillage and cover crops, reduce ethanol's lifecycle GHG emissions.<sup>3</sup>

The best way to unlock decarbonization opportunities from climate-smart agriculture is through clean fuel policy which stands up markets to help offset farmer cost of adoption. For example, in 2020, Argonne National Laboratory indicated no-till, cover crops and nutrient management could be worth \$279 per acre if they were allowed to generate credits under California's Low Carbon Fuel Standard.<sup>4</sup> At that value, farmers would rapidly adopt practices leading to meaningful reductions in the lifecycle carbon emissions of biofuels.

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<sup>1</sup> U.S. President Joe Biden during an April 12, 2022 visit to Iowa announcing a temporary national emergency waiver for E15. <https://www.whitehouse.gov/briefing-room/speeches-remarks/2022/04/12/remarks-by-president-biden-on-lowering-energy-costs-for-working-families/>

<sup>2</sup> Smith, P., D. Martino, Z. Cai, D. Gwary, H. Janzen, P. Kumar, B. McCarl, S. Ogle, F. O'Mara, C. Rice, B. Scholes, O. Sirotenko, 2007: Agriculture. In *Climate Change 2007: Mitigation. Contribution of Working Group III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change* [B. Metz, O.R. Davidson, P.R. Bosch, R. Dave, L.A. Meyer (eds)], Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, at p. 499 (emphasis in original), available at <https://www.ipcc.ch/site/assets/uploads/2018/02/ar4-wg3-chapter8-1.pdf> (last viewed July 16, 2020) (hereafter, 2018 IPCC Agriculture Chapter).

<sup>3</sup> <https://ethanol.org/carbon/usda-rcpp/>

<sup>4</sup> <https://iopscience.iop.org/article/10.1088/1748-9326/ab794e>



Unfortunately, the California LCFS does not yet allow carbon credits for biofuels produced from climate-smart agriculture, and since EPA's proposal puts all our eggs in one basket, it fails to unlock the significant carbon mitigation potential from agricultural lands and ethanol.

We can and should do better.

EPA should reconsider its proposal, develop a technology-neutral approach to decarbonizing transportation fuel, and engage with ACE as we implement our project to ensure fair and accurate accounting for GHG reductions from climate-smart agriculture and ethanol.