

On behalf of the Minnesota Corn Growers Association and its nearly 6,500 farmer-members we appreciate the opportunity to provide testimony on the Renewable Fuel Standard.

My name is Richard Syverson, a farmer from Clontarf, Minnesota. I currently serve as the First Vice President of the Minnesota Corn Growers Association. In addition to farming in Western Minnesota with my family, I am a shareholder in the Chippewa Valley Ethanol Company in Benson, Minnesota, a 50 million gallon per year ethanol plant and serve as a current board member of the American Coalition for Ethanol.

Since the RFS became law, America's corn farmers have stepped up to the plate to help ensure the law is successful. A successfully implemented RFS provides certainty in agriculture markets, reduces air emissions and lowers fuel prices for consumers. .

MCGA is pleased to see that EPA is proposing renewable fuel growth in the 2022 Renewable Volume Obligation while also seeking to restore RFS integrity by responding to the Court's 2017 remand by adding 250 million gallons and committing to the other 250 million gallons in 2023. EPA is also taking steps to reign in abuse of refinery waivers granted in previous years. We are, however, disappointed that part of EPA's proposal is to retroactively reduce the 2020 volume obligation. In order to build confidence in the RFS, volumes set need to be enforced and not undercut by retroactive refinery waivers or cuts to volume obligations.

The RFS law has a mechanism in place to adjust for declines in fuel consumption, as was experienced in 2020 due to the pandemic. The proposed retroactive cuts for 2020 and the proposed volume obligation for 2021, reduce volume obligations beyond the actual decline in fuel consumption. These proposed cuts reward the use of more oil instead of clean, renewable fuels such as corn ethanol.

Corn farmers stand ready to work with EPA to offer immediate and affordable emission reductions via the use of low carbon ethanol in our transportation fuel supply. In order to do this, we need EPA to:

First, quickly finalize the 2022 RFS volumes and refinery waiver denials.

Second, rely on the automatic adjustment in the percent standards for 2020 and avoid the new precedent of retroactively cutting volume obligations already finalized.

Finally, respect actual fuel production numbers for 2020 and 2021.

Thank you for the opportunity to testify. We look forward to working with EPA to achieve greater emission reductions and cleaner air from renewable, affordable ethanol.