February 2, 2009

The Honorable Lisa Jackson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Jackson:

Our organizations strongly oppose proposals to increase the level at which ethanol can be blended into motor gasoline and we urge you to subject these proposals to the most careful analysis.

We strongly support the development of cellulosic ethanol and other advanced biofuels, as well as policies that will help commercialize biofuels that will reduce our reliance on food and feed to produce fuel. However, we are opposed to efforts to increase the amount of biofuel blended into our fuel supplies until sustainable biofuel alternatives are commercially available.

In particular, we believe EPA should not permit gasoline blends that contain more than 10 percent ethanol until:

- EPA completes a lifecycle assessment of the impacts of biofuels on climate change, as required by the Energy Independence and Security Act of 2007
- DOE and EPA complete an assessment of the impacts of intermediate blends on engines and certify that there are no performance, safety, or environmental concerns with raising the ten percent blend level
- Cellulosic and advanced biofuels are commercially available throughout the nation.
- Congress phases out the ethanol import tariff
- The completion of the National Academy of Sciences study required under section 203 of the Energy Independence and Security Act of 2007
- The completion of a robust rulemaking process, including a 180 day public comment period that allows the wide variety of stakeholders impacted by this decision to educate the agency on the impact of the intentional and unintended consequences of the proposed change
As you know, a five-fold increase in the production of conventional biofuels since 2000 - in combination with other factors, such as rising energy prices, poor weather, and global demand - has contributed to volatile commodity prices and a sustained period of commodity and food inflation. Nearly one-third of the 2008 corn crop is being diverted from food and feed to fuel.

Investing in cellulosic and advanced biofuels is one way the Administration can help ensure that we are not pitting our energy security policies against our food and climate security policies. We urge you to oppose proposals to increase the amount of biofuel into our fuel supplies until critical studies are completed and sustainable alternatives are commercially available.

Sincerely,

American Bakers Association  
American Beverage Association  
American Frozen Food Institute  
American Meat Institute  
Grocery Manufacturers Association  

National Chicken Council  
National Turkey Federation  
National Pork Producers Council  
National Restaurant Association  
Snack Food Association