September 28, 2010

The Honorable Gina McCarthy
Assistant Administrator for Air and Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Joint Opposition to Approval of "E12" Without Comprehensive New Engine, Emissions and Safety Testing

Dear Assistant Administrator McCarthy:

The undersigned organizations strongly oppose recent requests by ethanol manufacturers that the Environmental Protection Agency (EPA) approve a new and untested mid-level ethanol blend ("E12," or gasoline blended with 12 percent ethanol) for all gasoline engines.

There has been no opportunity to review the data submitted in support of an E12 authorization, no public comment period or peer review of the data purported to support this request, and no specific testing conducted by independent experts that supports the data submitted. We collectively agree that EPA must move cautiously to prevent the introduction of new mid-level ethanol blends that may impact engine durability, increase emissions, be incompatible with existing on- and non-road vehicles and engines, and decrease consumer safety.

Our organizations continue to oppose the introduction of E15 into commerce without comprehensive and independent testing. EPA approval of E12, without the same rigorous and extensive independent testing and without the opportunity for public comment and critique of the data submitted to support E12 would be misguided and would sidestep the new fuels and additives protections enacted by Congress and embodied in Section 211(f)(4) of the Clean Air Act.

Sincerely yours,

American Meat Institute
American Petroleum Institute
Association of International Automobile Manufacturers
Engine Manufacturers Association
Grocery Manufacturers Association
International Liquid Terminals Association
International Snowmobile Manufacturers Association
Motorcycle Industry Council
National Chicken Council
National Consumers League
National Council of Chain Restaurants
National Marine Manufacturers Association
National Meat Association
National Petrochemical & Refiners Association
National Turkey Federation
NATSO – National Association of Truck Stop Operators

Natural Resources Defense Council
Outdoor Power Equipment Institute
Recreational Off-Highway Vehicle Association
Small Business & Entrepreneurship Council
Snack Food Association
Specialty Equipment Market Association
Specialty Vehicle Institute of America

cc: The Honorable Barbara Boxer
The Honorable Jim Inhofe
The Honorable Henry Waxman
The Honorable Joe Barton