

Kansas Corn Submits Comments Strongly Opposing Renewable Fuels Standard Waiver

The Kansas Growers Association submitted comments to the Environmental Protection Agency voicing its strong opposition to a waiver of the Renewable Fuels Standard. EPA had requested comments from interested parties after receiving petitions requesting a waiver of the RFS.

"Those petitioning for an RFS waiver must meet the criteria by proving that the RFS harms the economy of their state, region or nation; that the harm was caused by the implementation of the RFS; that the harm is severe, and that the harm is redressable by lowering the RFS. We fail to see that the petitioners can meet any of these criteria. In fact, it is our strong opinion that an RFS waiver would truly harm the economy of our state and our nation."

KCGA made the following points in their comments:

- The drought, not the Renewable Fuels Standard, reduced the corn supply in 2012.
- Ethanol expansion, due in part to the RFS, has created jobs and economic growth in small rural communities.
- The RFS has built-in flexibility to deal with market anomalies, like a drought-damaged crop. Renewable Information Numbers, (RINs) represent excess renewable fuel credits that are held and traded by the fuel industry. There are approximately 2.5 billion gallons of RINs in the market today, which is equal to about one billion bushels of corn.
- A waiver would accomplish little. A recent Food and Agriculture Policy Research Institute (FAPRI) study concluded a full waiver may reduce corn prices by only one half of one percent, and the supply of corn for livestock would only increase by 0.6 percent. The analysis shows a waiver would have no effect on retail beef prices, and might shave one cent a pound from retail pork prices.
- An RFS waiver would cause economic harm. Ethanol lowers consumer fuel prices, contributes to rural economies, produces high nutrient distillers grains for livestock feed, reduces imports of foreign oil.

KCGA's comments pointed to the economic benefits brought by the Renewable Fuels Standard.

"To say the RFS is working is an understatement. In 2011, ethanol replaced the need for imported oil by the equivalent of 485 million barrels in a year when oil reached historic highs with the 2011 average at \$111 a barrel. It has provided jobs and economic growth in small rural communities and has helped to revive the farming industry; all while providing a renewable, clean burning fuel for America. The RFS truly has helped security, economy and health of our nation."

[Read KCGA's full comments here.](#)