

January 15, 2020

Dear Division Director Ron Hayes:

We write to ensure you are aware of our opposition to the proposals: FAL 20.2 and FAL 20.3, that have been submitted to the National Conference on Weights and Measures for consideration. The Missouri Corn Growers Association is investing significant resources to expand ethanol market share in support of U.S. agriculture – an industry that just experienced one of the worst growing seasons in history. In Missouri alone, growers had 750,000 acres of corn go unplanted and yet U.S. corn stocks for 2019 are estimated at 1.89 billion bushels.

Ethanol is a high quality, consistent component in gasoline that must adhere to strict fuel quality specifications. At a time of significant motor fuel consumption, nearly every gallon of gasoline in the United States contains a minimum of 10% ethanol and 15% ethanol blends are gaining market share. Consumers have now driven more than 8 billion miles on 15% ethanol blends and retailers have conducted millions of transactions.

The FAL 20.2 and FAL 20.3 proposals create dual regulatory authority for federal regulation, placing additional burden on state government personnel with no technical justification. It is our preference that state level officials focus on the business of the state and not duplicate the efforts of Federal Agencies. The U.S. Environmental Protection Agency already has a robust compliance program and misfuelling mitigation in place for E15 including a required sampling program that ensures proper blending and labeling. The FAL 20.2 and FAL 20.3 proposals are duplicative and unnecessary.

We feel these proposals have no merit and urge you to oppose these proposals by identifying these items to be “withdrawn” from consideration at the National Conference of Weights and Measures Interim Meeting at the upcoming meeting the week of January 27, 2020.

Thank you for your consideration. Please feel free to contact us with comments or questions.

Respectfully submitted,



Bradley Schad
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cc: Craig Van Buren, Chair, National Conference on Weights and Measures
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