

October 13, 2016

Senator James Inhofe
Chairman, Senate Environment and Public
Works Committee
410 Dirksen Senate Office Building
Washington, DC 20410

Representative Fred Upton
Chairman, House Energy and Commerce
Committee
2125 Rayburn House Office Building
Washington, D.C. 20515

Senator Barbara Boxer
Ranking Member, Senate Environment and
Public Works Committee
456 Dirksen Senate Office Building
Washington, DC 20410

Representative Frank Pallone, Jr.
Ranking Member, House Energy and
Commerce Committee
2125 Rayburn House Office Building
Washington, D.C. 20515

Re: Enhancement to the RFS Misfueling Mitigation Plan

Dear Chairman Inhofe, Ranking Member Boxer, Chairman Upton and Ranking Member Pallone:

The undersigned organizations, representing small-engine consumers and manufacturers in the United States, continue to have serious concerns about the market growth of fuel blends consisting of 15 percent ethanol by volume (E15). The existing Misfueling Mitigation Plan (MMP) that accompanied the introduction of E15 remains inadequate, failing to educate, warn or protect the consumer from using federally prohibited fuel in their small engine products.

A recent bipartisan letter signed by 45 Members of Congress brought this concern to the EPA, but more needs to be done to better protect the American consumer from the dangers of accidental misfueling. According to a 2016 Harris Poll, only five percent of consumers are aware that E15 is prohibited for use in certain engines. And despite best efforts to educate the consumer, work by the private sector has failed to significantly alter the public's familiarity with ethanol based fuels—less than 25 percent of Americans currently notice ethanol content while at the pump.

With E15 expected to increase in volume of sales and spread into new markets, enhancements to the existing misfueling mitigation plan are merited. Such modifications would not be unheard of, and in many cases follow the precedent set by EPA in the 1970s when the country shifted to unleaded fuel blends. A more comprehensive plan will prove beneficial to consumers and industries alike, and ensure that millions of small engines are used in a safe and responsible manner.

Specifically, we encourage Congress to act swiftly to ensure that EPA implements a Misfueling Mitigation Plan that:

- Guarantees the indefinite and universal availability of approved fuel blends, containing no more than 10 percent ethanol by volume.
- Works with all stakeholder groups to develop a more comprehensive consumer-focused set of resources.

- Improves existing at-pump signage and labelling.
- Utilizes existing public data (i.e. state boater registration) to conduct official outreach to small-engine consumers.
- Develops and utilizes traditional and digital media campaigns aimed at raising consumer awareness of E15's approved usage.

Sincerely,

American Motorcyclist Association
American Sportfishing Association
BoatU.S.
International Snowmobile Manufacturers Association
Marine Retailers Association of the Americas
Motorcycle Riders Foundation
National Marine Manufacturers Association
Outdoor Power Equipment Institute
Recreational Boaters of California
Recreation Vehicle Industry Association

Cc: Members, Senate Environment and Public Works Committee
Members, House Energy and Commerce Committee